



## Modern Slavery Act 2015

### **Our structure, business and supply chains**

FKA Brands Ltd. (FKABL) and its subsidiaries are a wholly owned subsidiary of Ludgate 329 Limited and the ultimate holding company is FKA Distributing Co LLC (FKA) a US limited liability partnership. FKABL is an SME of 71 people. The Directors of FKA Brands Ltd have approved this Section 54 statement for the reporting period October 2020 to September 2021.

FKABL purchase products and services from third party factories and service providers located in Vietnam, China and the UK. Using the SEDEX risk assessment tools China and Vietnam are considered high-risk areas along with the associated raw materials, especially minerals which may come from high-risk countries. Using the SEDEX tools all our Chinese and Vietnamese suppliers are assessed as medium risk.

FKABL has been a member of SEDEX since 2009. Usually, all our factories are required to be member of SEDEX and assess their compliance to the SEDEX ethical standards which include that Forced Labour of any kind is not used, that their recruitment processes are fair and that employees are free to join unions, councils etc. SEDEX is the world's largest collaborative platforms for sharing responsible sourcing data on supply chains, used by more than 50,000 members in over 150 countries.

In response to the Covid Emergency FKABL sourced Medical Masks to support the care industry and general public from 2 factories. This is considered exceptional business and unlikely to be repeated. Due to the speed of response these factories did not join SEDEX. These masks were mostly purchased as single items and as such they would make the volume of items imported from factories that had not been externally audited much higher. We knew that both factories were also supplying to other EU Governments and inspectors visited the factories to inspect the masks prior to shipment. A further purchase was made from one of these factories in 2021 but FKA is not considering any future purchases of masks.

FKA purchased from 5 factories in 2021 that are not members of SEDEX which represents 3% of our purchased volume. FKA stopped purchasing from 3 of these factories during 2021 and the remaining factory only accounts for 0.4% of the 2021 purchased volume.

FKABL utilizes the services of HoMedics Information Consulting (Shenzhen) Co., Ltd a wholly owned subsidiary of FKA and these employees ensure our policies and procedures are adhered to within the Chinese factories.

FKABL supplies to customers in the EMEA region using market leading warehouse and logistics companies.



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## Our policies in relation to slavery and human trafficking

Before a purchase order is placed with a new factory they must sign and agree to our terms and conditions which require that no forced labour of any kind be used in the manufacture of our products. These conditions include our Ethical Policy which can be found [here](#). Our conditions are generally updated annually. All our manufacturers have signed our terms and conditions in the last 24 months.

## Our due diligence processes regarding slavery and human trafficking in its business and supply chains

To ensure adherence to this requirement FKABL has the following processes in place:

- All FKABL staff that regularly visit our suppliers, conduct UK recruitment or appoint contractors are trained to spot signs of forced labour. We use training modules supplied by the Safety Media and SEDEX platforms.
- Factories are audited by FKA employees before approval is given for the factory to become a supplier to FKABL and audited at least every 2 years.
- Other Chinese FKA employees such as Expeditors and Pre-Shipment Inspectors regularly visit the factories, are required to look for signs of any forced labour and must report any concerns.
- FKABL employees from the UK and FKA employees from the USA also visit the factories, they are required to look for signs of any forced labour and must report any concerns. These include the Senior Management, Quality & Compliance, Operations and Marketing. Due to the Covid Emergency it has not been possible to conduct the same number of visits in this reporting period. FKA have supplemented the onsite visit where possible with remote sessions with our suppliers and these will continue into the next reporting period.
- The Employee Handbooks detail our whistleblowing policies.
- If FKA detected the use of Forced Labour in any of its suppliers FKA would:
  - Immediately stop all production
  - Work with the factory on a corrective action plan
    - If a plan could not be agreed upon, we would remove the supplier from our Approved Supplier List.
  - Notify our Trade Associations
  - If necessary, notify the local authorities and provide any evidence obtained by FKA
- Our factories are also used by other leading global manufacturers and retailers who also conduct similar audits to FKA.
- FKABL supplies leading UK retailers who require many of our factories to be independently audited to SMETA, BSCI, RBA standards by reputable EU based auditors (Intertek, BV, TUV, SGS, UL etc.). In 2015, 66% of our volume came from these audited suppliers; this has grown to 97% of our suppliers in 2021.



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- Currently the UK offices and our factories do not have trade union membership. Employees in the UK and our factories are allowed to join a trade union or similar organisations.

- To date, no evidence of Modern Slavery has been detected by FKABL during our own or third-party audits.

In our 2021 survey of our suppliers:

- 100% are aware of the need to monitor the whole supply chain up from 94% last year.
- 94% are already monitoring their suppliers up from 88% last year.

During the coming year FKA Brands Ltd. will be

- Following up on these results to review the supporting evidence, ensure that all suppliers are monitoring their supply chain and improve the monitoring of our supply chain.
- Using the SEDEX RADAR Tool to identify the factories at the highest risk and work with them to address the areas that require improvement
- Our Exec VP and GM of Health and Wellness has initiated a Global Environmental and Social Governance project which will enhance our ability to spot any signs of Modern Slavery

Swarup Banerjee  
Chief Executive Officer and Vice President EMEA

02-Mar-2022



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