

## MODERN SLAVERY STATEMENT

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### **Introduction**

This voluntary statement provides information on Kukri Sports Limited's standards and policies which seek to prevent modern slavery and human trafficking in all our business operations and is made in accordance with Section 54 of the Modern Slavery Act 2015.

### **Our Business**

We are a sportswear brand based in Preston, Lancashire and have been producing bespoke teamwear since 1999. Consisting of seven subsidiary businesses in United Kingdom, Ireland, Canada, United Arab Emirates, Hong Kong, Australia, and New Zealand, Kukri Sports Limited employs 83 people globally with an annual turnover of £19 million for the financial year to 31<sup>st</sup> January 2024.

Our products are supplied to market through wholesale or direct to consumer distribution channels and we have a licensing agreement for our trademark across a range of apparel in place in South Africa.

Kukri Sports Limited does not own, operate, or manage any manufacturing facilities. More than 90% of globally supplied products are manufactured across four factory sites, two in the UK and two in Asia, with whom we have longstanding supply agreements.

### **Our Policies**

We have an Ethical Trading Policy, a copy of which can be found [here](#). (Hyperlink to Ethical Trading Policy)

Our Ethical Trading Policy establishes a procedure for protecting workers and providing assurance that our products are manufactured within safe and fair conditions. The code of practice applies to everything we do and the people working for our suppliers are to be treated with respect, and their health and safety and basic human rights must be protected and promoted.

We recognise that human rights are a fundamental principle which allow an individual to lead a dignified and independent life, free from abuse and violations. We will not tolerate, nor will we condone, abuse of human rights within any part of our business or supply chain. Any allegations that human rights are not respected will be taken very seriously.

We are committed to complying with the applicable laws and regulations in all countries in which we operate. We will conduct ourselves with professionalism, honesty, and integrity whilst working with our suppliers and third parties to ensure our high ethical standards are maintained.

We are also committed to ensuring that our suppliers are responsible for ensuring that every site producing our products meets or exceeds minimum labour standards and adheres to the local laws and our Code of Practice. This Code of Practice is set to core principles that suppliers must commit to meeting as a condition of doing business with us. The code is based upon international best practice, including the principles of the International Labour Organisation (ILO) and the Fair Labour Association Standard (FLA).

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**Employment Relationship** – Rules and conditions of employment that respect workers and as a minimum, safeguard their rights under national and international labour and social security laws and regulations shall be adopted and adhered to.

**Non-Discrimination** – No person shall be subject to discrimination in employment, including hiring, compensation, advancement, discipline, termination, or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group, or ethnic origin.

**Harassment or Abuse** – Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse.

**Forced Labour** – There shall be no use of forced labour, including prison labour, indentured labour, bonded labour, or other forms of forced labour.

**Child Labour** – No person shall be employed under the age of 15, or under the age for completion on compulsory education, whichever is higher.

**Freedom of Association and Collective Bargaining** – Recognise and respect the right of employees to freedom of association and collective bargaining.

**Health, Safety and Environment** – Provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of facilities. Responsible measures should be adopted to mitigate negative impacts that the workplace has on the environment.

**Hours of Work** – Not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work shall not exceed 48 hours and 24 consecutive hours of rest shall be allowed in every seven-day period. All overtime shall be consensual and not requested on a regular basis, all overtime work shall be compensated at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

**Compensation** – Every worker has a right to compensation for a regular work week that is sufficient to meet the workers basic needs and provide some discretionary income. The minimum wage, or appropriate prevailing wage, shall be paid, whichever is higher and all legal requirements on wages, including the provision of fringe benefits required by law or contract, shall be complied with.

It is important that all workers, in our business and supply chains, understand the Code of Practice as it sets out their rights in the workplace.

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## **Due Diligence**

We recognise that the highest risk of modern slavery exists within our supply chain and undertake a range of annual audits and assessments to check conditions within these factories, alongside annual visits by our Sourcing Manager. All suppliers are subject to these third-party audits which include modern slavery indicators as well as site safety and document inspections, worker interviews, off site assessments, accommodation checks and general due diligence.




We review our audit methodology periodically, and accept the following audit formats:

Sedex members Ethical Trade Audit (SMETA)  
Business Social Compliance Initiative (BSCI)  
Worldwide Responsible Accredited Production (WRAP)

Any factory directly, or indirectly offering, paying, soliciting, or accepting bribes or kickbacks including facilitation payments is strictly prohibited.

## **Risk Management**

Upon receipt of an audit and following our own site visit and risk assessment, each factory is graded using a traffic light system and only factories with a green or amber grade may be utilised.

-  Risk Assessment completed and in date Audit.
-  Risk Assessment completed and Audit expired.
-  No Risk Assessment and Audit Expired.

Based on minor, major or critical non-compliances highlighted at audit, the factory is then further graded, Green A, B or C. In the event of a critical non-compliance the factory will be graded green C, and the critical noncompliance must be resolved before the factory can be regraded and reinstated. Evidence of the measures taken must be provided by verifiable desktop evidence or re audit.

Major and minor non-compliances will be graded green B & A respectively meaning these factories can continue to be used, providing the supplier commits to resolve the non-compliances within an agreed timescale.

Regular reviews are undertaken to ensure the process remains current and fit for purpose.

## **Training**

All staff are given training that provides a basic level of understanding of the issue of modern slavery and our policy in respect of modern slavery.


Those staff members who are directly involved in procurement and overseas procurement are trained specifically to their role. This includes undertaking annual CPD Accredited eLearning in addition to externally hosted training courses.

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This policy has been approved by the board for the financial year to the end of January 2025 and will be reviewed annually.



Andrew Ronnie  
Group Chief Executive Officer