

BX Merchandise

Modern Slavery, Human Trafficking & Ethical Sourcing Policy

1. Purpose

BX Merchandise is committed to conducting business ethically, responsibly, and with integrity.

We have a zero-tolerance approach to all forms of:

- Modern slavery
- Human trafficking
- Forced labour
- Bonded labour
- Child labour
- Exploitative employment practices

We are committed to ensuring that slavery and human trafficking are not present within:

- Our business operations
- Our recruitment practices
- Our supply chain
- Our business partnerships

This policy supports our commitment to ethical sourcing, sustainability, human rights, and responsible business practices.

2. Scope

This policy applies to:

- Directors
- Employees
- Temporary workers
- Contractors
- Recruitment agencies
- Suppliers
- Manufacturers
- Logistics partners
- Consultants and service providers

This policy applies throughout the BX Merchandise supply chain.

3. Legal Framework

BX Merchandise operates in accordance with:

- Modern Slavery Act 2015
- Human Rights Act 1998
- Employment Rights Act 1996
- Equality Act 2010
- UK Immigration and Employment legislation

This policy also supports:

- UN Guiding Principles on Business and Human Rights
- ILO Core Labour Standards
- Ethical Trading Initiative principles

as referenced within our current policy framework.

4. BX Merchandise Business Context

BX Merchandise is a promotional merchandise company specialising in:

- Design
- Sourcing
- Supply
- Branding
- Distribution

of promotional merchandise, branded gifts, PPE, and corporate clothing.

We do not own manufacturing facilities.

As products are sourced through a global supplier network, the highest modern slavery risks occur within:

- Manufacturing
- Importing
- Raw material sourcing
- Logistics and fulfilment

Therefore, supplier selection and monitoring are critical controls within our business.

5. Commitment to Ethical Sourcing

BX Merchandise will:

- Work with reputable suppliers
- Promote ethical business practices
- Encourage transparency within supply chains
- Challenge poor labour practices
- Support sustainable and responsible sourcing

When selecting suppliers, we consider:

- Ethical standards
- Labour practices
- Product safety
- Environmental performance
- Quality performance

This aligns with our Quality Policy, Environmental Policy and Product Safety & Compliance processes.

6. First Aid Procedures

Modern slavery risk is managed through our Supplier Approval Process.

Before approving suppliers, BX Merchandise may review:

- Supplier location
- Manufacturing locations
- Ethical trading credentials
- Labour standards
- Sustainability certifications
- Product compliance documentation

Where appropriate, suppliers may provide evidence such as:

- Sedex membership
- Ethical audit reports
- Modern Slavery Statements
- Environmental certifications
- Social compliance programmes

This complements our supplier onboarding and monitoring processes.

7. Incident Reporting

Approved suppliers are monitored through:

- Performance reviews
- Complaint trends
- Non-conformance investigations
- Product quality reviews
- Annual supplier assessments

Suppliers may be required to explain significant changes relating to:

- Manufacturing locations
- Workforce practices
- Compliance status
- Ethical certifications

Where concerns arise, additional due diligence may be conducted.

8. Recruitment & Employment Practices

BX Merchandise is committed to fair and lawful employment practices.

We will not:

- Use forced labour
- Retain employee identity documents
- Charge recruitment fees
- Permit exploitative labour practices

Employees are entitled to:

- Written employment terms
- Fair pay
- Lawful working conditions
- Freedom to leave employment in accordance with contractual notice

All recruitment activities must comply with UK employment legislation.

9. Warning Signs of Modern Slavery

Employees should remain alert to potential indicators such as:

- Workers appearing fearful or controlled
- Lack of personal identification documents
- Excessive working hours
- Poor accommodation conditions
- Restricted freedom of movement
- Unusual recruitment arrangements
- Reluctance to speak openly

The presence of one sign does not automatically indicate slavery, but concerns must always be reported.

10. Reporting Concerns

Any suspected modern slavery concern must be reported immediately.

Employees may report concerns to:

- Their line manager
- Operations Manager
- Director

Concerns will be treated seriously, sensitively and confidentially.

BX Merchandise will not tolerate retaliation against anyone who raises a genuine concern in good faith.

11. Investigation & Escalation

Where a concern is raised:

Step 1 - Record Concern

Document the issue and available evidence.

Step 2 - Initial Assessment

Management assesses seriousness and immediate risk.

Step 3 - Investigation

Relevant information is gathered from suppliers or other parties.

Step 4 - Corrective Action

Actions may include:

- Supplier corrective action plans
- Additional audits
- Supplier monitoring
- Contract review

Step 5 - Escalation

Serious concerns may be escalated to:

- Regulatory authorities
- Law enforcement
- Relevant industry bodies

All actions must be documented.

12. Training & Awareness

BX Merchandise provides:

- Employee induction training
- Periodic awareness training
- Supplier awareness where appropriate

Training covers:

- Modern slavery risks
- Ethical sourcing
- Reporting concerns
- Supplier due diligence

Training records are maintained within the Competence & Training System.

13. ISO Alignment

This policy supports:

ISO 9001:2015

- Clause 4.2 – Interested Parties
- Clause 7.2 – Competence
- Clause 8.4 – Control of External Providers
- Clause 10.2 – Corrective Action

ISO 14001:2015

- Clause 6.1 – Risks & Opportunities
- Clause 7.3 – Awareness
- Clause 8.1 – Operational Control

14. Monitoring & Continuous Improvement

BX Merchandise monitors:

- Supplier compliance
- Ethical sourcing activities
- Training completion
- Complaints and investigations
- Supplier non-conformances

This information is reviewed through:

- Supplier Reviews
- Internal Audits
- Management Review Meetings

to support continual improvement.

15. Policy Statement

BX Merchandise is committed to conducting business ethically and responsibly. We expect the same high standards from our suppliers, contractors, and business partners. Through supplier due diligence, ethical sourcing, employee awareness, and continual monitoring, we work to minimise the risk of modern slavery and human trafficking within our business and supply chain and support respect for human rights throughout our operations.