

## Modern Slavery Statement

### Introduction

The Pebble Group plc is committed to acting ethically and with integrity. We ensure that effective systems and controls are in place and are enforced to combat modern slavery and to ensure that slavery and human trafficking is not taking place anywhere within the Group or its associated supply chains.

### Organisation Structure and Business

The Pebble Group plc is a provider of technology, services and products to the global promotional products industry. We are the parent company of two differentiated businesses, focused on specific areas of the promotional products market.

#### Our Businesses:

- Brand Addition based in the UK focuses upon providing promotional products and related services under contract to some of the world's most recognisable brands. Its largest contracts are valued in the millions of pounds with the products and services supplied being used for brand building, customer engagement and employee rewards. Working in close collaboration with its clients, Brand Addition designs products and product ranges, hosts client-branded global web stores and provides international sourcing and distribution solutions. Brand Addition Limited has its own Anti-Slavery and Human Trafficking Policy and also publishes its own Modern Slavery Statement.
- Facilisgroup based in the United States focuses on supporting the growth of mid-sized promotional product businesses in North America by providing a technology platform, which enables those businesses to benefit from significant business efficiency and gain meaningful supply chain advantage from the ability to purchase from quality suppliers under preferred terms. Facilisgroup has its own Anti-Slavery and Human Trafficking Policy but, as it does not carry on business in the UK, it does not publish its own Modern Slavery Statement and this statement covers its activities as part of the Group.

### Our Supply Chains

Brand Addition sources its products through several different supply routes such as importers, along with 1<sup>st</sup> and 2<sup>nd</sup> tier suppliers in the UK, Europe, North America and Asia. The core items sourced include apparel, electronic items, ceramics, stationery, packaging, gift items, umbrellas, and bags.

Facilisgroup's supply chain consists of technology service providers such as software licenses, hardware supply, managed hosting services and software solutions.

Both businesses also receive their own 'facilities management' supplies, such as building maintenance, office consumables and people services for the purposes of recruitment.

### Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our businesses. Our Anti-Slavery and Human Trafficking Policies reflect the Group's commitment to acting ethically and with integrity in all our business relationships. This promotes and supports the implementation and enforcement of effective systems and controls to ensure that slavery and human trafficking does not take place anywhere in the Group's supply chains.

### Due Diligence and Onboarding Processes

The Group is committed to ensuring transparency in its own business and in its approach to tackling modern slavery issues throughout its businesses and their supply chains, consistent with our disclosure obligations under the Modern

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Slavery Act 2015. We expect the same high standards from all our agents, contractors, suppliers and business partners throughout the Group.

During the financial year ending 31 December 2023, as part of the Group's supplier contracting processes, our businesses included specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

As part of our initiative to identify and mitigate risk of modern slavery, we also adhere to the following systems across the Group:

- We communicate internally with our employees through our Anti-Slavery and Human Trafficking Policy and related procedures, which are also available on our intranet.
- We ensure that our Anti-Slavery and Human Trafficking Policy, and related procedures are disseminated and adopted throughout our Group's businesses.

### Supplier Adherence to our Values

We acknowledge that modern slavery and human trafficking exist in many, if not all, countries in which we and our suppliers operate. We have zero tolerance to slavery and human trafficking and we expect all those in our supply chain and contractors to comply with our values and behave consistently with the provisions of our Policies. Across the Group we have in place rigorous selection processes which help ensure our suppliers and their supply chains are slavery free. As part of the assessment process and ongoing monitoring of our supply chain, we and our businesses carry out regular reviews to ensure suppliers are adhering to our values and the information held on file is kept up to date. The senior management teams across our Group are responsible for compliance in their respective departments and for seeking to educate those individuals who manage the supplier relationships on the practical implementation of the Group's Anti-Slavery and Human Trafficking Policy.

### Training

We work in collaboration with our suppliers at supplier review meetings or on their premises during the audit process to advise on best practice. In 2023, we updated our modern slavery training and this was rolled out across both businesses throughout the year to act as a refresher for existing employees. This updated training is now also included in the induction programme for all new employees joining the business. The training ensures that all employees are able to detect and recognise the signs of modern slavery and know how to act and prevent the potential risk of modern slavery exposure across the Group and our supply chain.

For each business, in particular:

#### **Brand Addition Limited**

- Brand Addition communicates internally with its employees through its Anti-Slavery and Human Trafficking Policy and related procedures.
- Issues an ethical code of conduct for signature by all suppliers on an annual basis, which details expectations to mitigate the risk of modern slavery and human trafficking and sets out its position on broader corporate and social responsibilities. A strict cotton sourcing policy is also in place, preventing the use of cotton, fabrics and fibres within product or in the manufacture of products from the Xinjiang province in China, Uzbekistan, Tajikistan, Syria and Turkmenistan.
- Each order placed with a supplier is subject to the supplier's acceptance of the Brand Addition standard terms and conditions of purchase which includes the ethical code of conduct.
- Templates used for third party partner supply agreements and supplier agreements contain compliance clauses on anti-slavery and human trafficking, with termination rights for non-compliance.

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- Brand Addition conducts onsite visits, inspections and assessments of its suppliers using its own trained auditors or third-party auditors to review and verify compliance against its code of conduct.
- Audit resource and prioritisation of audits are based upon countries / geographical areas with the greatest risk of modern slavery and human trafficking. All product suppliers based in Asia are subject to 100% on-site assessment by Brand Addition trained auditors or through third-party assessment commissioned by Brand Addition. All suppliers are required to meet minimum criteria before they can be approved.
- Audits are conducted using a bespoke audit framework developed by Brand Addition which is based upon the principles outlined in the International Labour Organisation (ILO), Social Accountability 8000 (SA 8000) and the Ethical Trading Initiative (ETI). Each audit is conducted in two phases: an initial desktop and credentials assessment to ensure that the supplier meets a minimum standard; followed by an onsite assessment to evaluate the working practices, working conditions, factory management, ethical and environmental standards (which include the potential risk of modern slavery and human trafficking) and product quality. Audits are valid for two years, after which time suppliers are re-assessed to ensure they continue to meet the necessary requirements. Any supplier who fails to meet the minimum requirements is blacklisted and cannot be used.
- Brand Addition has a confidential integrity line and procedure in place to encourage the reporting of any ethical concerns and the protection of whistleblowers. The integrity line is available internally and externally to our suppliers who are encouraged to use it to report any issues or concerns in connection with our business.

### Facilisgroup

- All Preferred Suppliers are required to comply with a written Corporate & Social Responsibility Declaration, which follows the principles of the International Labor Organization (ILO) and Ethical Trading Initiative (ETI) relating to labor standards.
- All Preferred Suppliers are required to sign a supplier agreement confirming their commitment to the Promotional Product Association International (PPAI) code of conduct or provide a copy of their approach to managing social compliance which specifically covers modern slavery & human trafficking. The supplier agreement also contains anti-slavery and human trafficking provisions to the contract, with termination rights for non-compliance.
- Facilisgroup has a confidential integrity line and procedure in place to encourage the reporting of any ethical concerns and the protection of whistleblowers. The integrity line is available internally and externally to our suppliers who are encouraged to use it to report any issues or concerns in connection with our business.

## Key Performance Indicators

Our businesses use the following key performance indicators (KPIs) to measure their effectiveness to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

### Brand Addition Limited

- Use of labour monitoring and payroll systems.
- Internal Brand Addition audits and third-party audits.
- Supplier evaluation performance programme.
- Supplier assessments within the UK, Europe, Turkey, North America and Asia, prioritising on-site assessment in countries and geographies with the greatest risk of modern slavery and human trafficking:
  - 100% of bespoke product suppliers based in Asia are audited every two years.
  - 80% of the top 45 suppliers by spend have been audited by Brand Addition in the last two years.
- Annual assessment of its full supply chain.
- Supplier selection based upon risk, location, product type and supplier spend.

### Facilisgroup

- Ensure suppliers support the Group's principals as set out in its Modern Slavery Statement and that they comply with applicable legislation and regulatory requirements.

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- Desktop evaluation of preferred suppliers' approach to product safety, compliance, and social responsibility, including the number of audits undertaken over the last three years.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2023.**

It was approved by the Board on 14 March 2024.



### **Christopher Lee**

Chief Executive Officer  
The Pebble Group plc  
Date: 14 March 2024