

## 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. As 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/EU/USA and the Far East. The core items sourced include apparel, electronic items, ceramics, stationery, 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 through its businesses and their supply chains, consistent with our disclosure obligations under the Modern 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 2021, 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 have zero tolerance to slavery and human trafficking & 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 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 their supplier relationships.

### **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. Our employees receive training as part of the induction process, to ensure they understand the importance of ensuring that there is no modern slavery or human trafficking within the business or 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 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.
- Each order placed with a supplier is subject to supplier's acceptance of the Brand Addition standard terms and conditions of purchase which includes the ethical code of conduct.

- 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. Any issues identified are immediately reported and prompt action is taken to remediate the situation or terminate the relationship, if necessary.
- Brand Addition has a whistleblowing procedure in place to encourage staff to report concerns including any situation related to modern slavery, human trafficking or forced labour.

#### 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.
- We have a procedure in place to encourage the reporting of concerns and the protection of whistle blowers.

## Key Performance Indicators

Our businesses use the following key performance indicators (KPI's) 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.
- Vendor assessments within the UK, Europe, Turkey and Far East throughout the supply chain:
  - 80% of our top 45 suppliers have been audited by Brand Addition.
- Annual assessments 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.
- 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 2021. It was approved by the Board on 17 March 2022.

  
**Christopher Lee**

Chief Executive  
 The Pebble Group plc  
 Date: 17 March 2022

