Modern Slavery Policy

1. Our Commitment

Brand Alliance is dedicated to conducting business responsibly, ethically, and transparently. We are committed to preventing modern slavery within our operations and across our supply network. To support this commitment, we maintain systems, controls, and oversight processes designed to identify and address any potential risks in our own business or in any of our supply chains.

Our Business and Supply Chain

Brand Alliance designs, sources and supplies licensed and branded apparel and related products to retail customers. Our operations include Brand Alliance (License) Limited in the United Kingdom and Brand Alliance International Limited in Ireland. Manufacturing is undertaken by external suppliers rather than solely at our own premises.

Our sourcing network includes manufacturing partners in Bangladesh, China, India, Portugal, Turkey, UK and Pakistan, alongside other locations as business needs evolve. We recognise that garment production and multi-tier international supply chains can involve heightened risks relating to recruitment, wages, working hours, subcontracting and workers' ability to raise concerns. The countries named describe known sourcing locations and are not a comprehensive list of all production sites.

2. Our Position on Modern Slavery

2.1 Modern slavery is a criminal offence and a serious breach of basic human rights. It includes practices such as slavery, forced labour, compulsory labour, servitude, and human trafficking. These practices involve the exploitation of individuals through coercion, control, or deprivation of freedom for personal or commercial benefit.

2.2 Brand Alliance maintains a strict zero-tolerance stance toward all forms of modern slavery. We are committed to transparency in our business practices and to meeting our reporting obligations under the Modern Slavery Act 2015. We expect our suppliers, contractors, and all business partners to uphold the same standards.

3. Who This Policy Applies To

3.1 This policy applies to everyone working for or representing Brand Alliance, including employees at all levels, directors and officers, agency staff, contractors, consultants, recruitment agencies, suppliers and business partners. The entities and operations covered by any separate annual Modern Slavery Act statement will be identified in that statement.

3.2 This document does not form part of any employment contract and may be updated at any time.

4. Governance and Oversight

4.1 The Board of Directors has ultimate oversight of Brand Alliance's approach to preventing modern slavery. The Head of Compliance is responsible for coordinating this policy, maintaining appropriate controls and reporting significant concerns to the Board.

4.2 The day-to-day implementation, monitoring, and internal auditing are overseen by the designated Compliance Lead for factories. This role includes responding to queries and reviewing the effectiveness of our controls.

4.3 Managers at all levels are responsible for ensuring that individuals under their supervision understand and adhere to this policy.

5. Compliance with the Policy

5.1 All individuals covered by this policy are required to:

- Familiarise themselves with and follow this policy.
- Actively support the prevention and identification of modern slavery risks.
- Avoid any conduct that could contribute to or conceal such practices.

5.2 Concerns may be raised through the reporting channels identified in our Whistleblowing Policy or with the Compliance Manager. Where an anonymous online reporting facility is available, its verified direct link will be provided on the company website.

5.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

5.4 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify either your manager, the Compliance Manager or report it in accordance with our Whistleblowing Policy as soon as possible.

5.5 If there is uncertainty about whether certain practices or working conditions may constitute modern slavery, guidance should be sought from management or the Compliance Manager.

5.6 Brand Alliance encourages openness and will support anyone raising genuine concerns in good faith, including where concerns are subsequently found to be mistaken. Retaliation against a person who raises a concern in good faith is prohibited. Reports will be handled sensitively and, so far as practicable and lawful, confidentially.

6. Communication and Awareness of this Policy

6.1 To strengthen awareness, designated representatives are required to complete annual modern slavery training focused on identifying and mitigating supply chain risks.

6.2 Our zero-tolerance approach is communicated to suppliers, contractors, and business partners at the beginning of each business relationship and reinforced as necessary.

7. Breaches of this Policy

7.1 An employee who breaches this policy may face disciplinary action, up to and including dismissal for misconduct or gross misconduct, in accordance with the applicable disciplinary procedure.

7.2 Where concerns arise in the supply chain, Brand Alliance will assess the risk to affected workers, investigate appropriately, require proportionate corrective action and monitor its completion. Serious or unresolved critical breaches may lead to suspension of production or termination of the business relationship. Any response should prioritise worker safety and appropriate remediation.

8. Due Diligence Processes for Slavery and Human Trafficking

8.1. Risk assessment

We conduct ongoing assessments of modern slavery risks within our global supply chain through structured compliance reviews.

We maintain compliance monitoring, and production must not proceed at a factory with unresolved critical compliance issues.

Risks identified through our compliance reviews include:

- Excessive working hours
- Insufficient personal protective equipment (PPE) awareness
- Social security non-compliance
- Late wage payments
- Poor hygiene standards
- Lack of statutory approvals

Our risk assessments also consider indicators of forced labour and exploitation, including recruitment fees or debt bondage, retention of identity documents, restrictions on freedom of movement, coercive overtime, child labour, migrant-worker vulnerability and unauthorised subcontracting. The presence and severity of these risks are assessed by supplier and location; listing them does not imply a confirmed incident.

Risk-based supplier assessment

When assessing supplier risk, we consider, as appropriate, manufacturing location, labour-intensive processes, use of recruitment agencies or migrant workers, subcontracting arrangements, prior audit findings, corrective-action history and the reliability of information supplied. We seek to prioritise higher-risk sites for closer review and follow-up.

8.2. To further mitigate risks, we:

- Review prospective suppliers' policies and practices on forced labour and human trafficking before approval.
- Establish long-term supplier partnerships built on clear ethical expectations.
- Maintain confidential reporting mechanisms with whistleblower protections.
- Advise that they are subject to regular, including unannounced, factory visits and/or compliance audits.

- Require suppliers to disclose all production sites, each of which must be registered and compliant with our Manufacturing Agreement, including independent social and ethical audits.

Supplier contractual controls and factory oversight

Our Manufacturing Agreement sets expectations covering the prohibition of forced, bonded, trafficked and child labour; lawful pay and working hours; safe working conditions; freedom of association; responsible recruitment without unlawful worker fees; and cooperation with social compliance assessments and corrective actions. It also requires prior written approval for subcontracting and provides for inspection of relevant premises, records and processes.

Supplier approval and ongoing oversight may include review of independent social and ethical audits, site information, documented non-compliances and corrective-action plans. Material concerns are escalated for review, with follow-up proportionate to severity and potential harm to workers. The precise scope and frequency of audits varies according to risk and applicable customer or licensor requirements.

8.3 We seek to engage suppliers that meet our standards or demonstrate credible, time-bound progress on remediable issues. This does not permit production at a site with unresolved critical issues. Our Manufacturing Agreement addresses forced, bonded, trafficked and child labour, lawful wages and working hours, safe conditions, freedom of association, recruitment practices and subcontracting controls.

8.4 Worker-centred response and remediation

Where concerns are substantiated, we seek to protect affected workers, assess immediate safety needs and agree appropriate corrective action with relevant parties. Depending on the circumstances, this may involve remediation of recruitment fees, wages or working conditions, independent advice, enhanced monitoring, suspension of production or termination of a supplier relationship. We will not assume that immediate termination is always the best outcome for affected workers.

9. Measuring Effectiveness

9.1 We review the effectiveness of our approach through available compliance records and management oversight. Measures are developed and refined as supplier coverage and reporting capabilities evolve.

9.2 Where reliable records are available, measures considered include:

- The proportion of suppliers formally acknowledging our Supplier Code of Conduct.
- The number and severity of corrective actions raised and closed; and the completion of relevant modern slavery training.
- The number of high-risk suppliers assessed or audited each year.

10. Continuous Improvement Priorities

a) Supply chain: Review documented compliance findings, follow up corrective actions and strengthen awareness of social and ethical standards.
b) Supplier coverage: Continue developing controls and oversight as the number and geographical spread of manufacturing partner's change.
c) Compliance Team: Compliance capability: Review the resources and expertise needed to respond to changing supplier, customer and licensor requirements. These are continuing priorities and do not represent a claim that particular projects have been completed.

11. Approval for this Policy

This policy is subject to Board oversight and will be reviewed at least annually. The Head of Compliance coordinates implementation and proposed updates. Any separate annual statement published under section 54 of the Modern Slavery Act 2015 must identify the relevant financial year, describe steps actually taken during that year, be approved by the board, signed by a director and published in accordance with applicable requirements.