



## **SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR PMS INTERNATIONAL GROUP PLC & ITS SUBSIDIARIES**

### **STATUS OF THE POLICY**

PMS International Group's **Slavery and Human Trafficking Statement** is made pursuant to Section 54 of the Modern Slavery Act 2015. This Statement sets out the measures PMS has taken to address the risk of slavery and human trafficking taking place within its own operations and supply chains.

### **POLICY STATEMENT**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

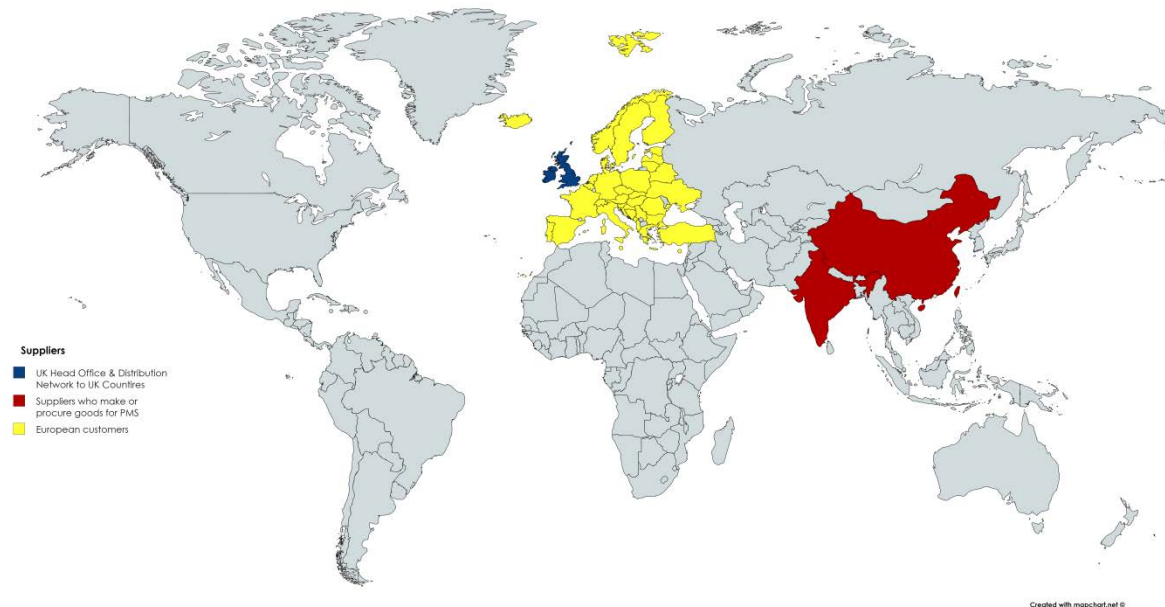
We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same standards from all of our contractors, suppliers and other business partners and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, volunteers, agents, contractors and suppliers.

## BUSINESS SECTOR

PMS' primary business is the importation and distribution of FMCG and PMS has approximately 250 employees in the UK and a group turnover in excess of £40 million.

PMS has customers and suppliers throughout UK, Europe and the Far East and also the Middle East. We service 20 international markets through export activities.



## RESPONSIBILITY FOR THE POLICY

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Our Legal and Compliance Counsel has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

In light of the Modern Slavery Act 2015, we have reviewed the content of our Corporate Policies and updated them.

## **ETHICAL CODE OF CONDUCT**

The PMS Ethical Code of Conduct is applicable to all personnel working for and on behalf of the PMS Group including direct employees and agency and contract staff and our Suppliers. The Code states that *“we expect our suppliers to meet the minimum standards set out in our Ethical Code of Conduct and we will not tolerate the use of child labour or forced labour in our worldwide operations”*.

All PMS direct employees are made aware of the Code on joining the business. The Code is available to Personnel on the intranet and Handbook and to external parties via the PMS corporate website.

Our Ethical Code of Conduct is also promulgated to all our suppliers.

## **RECRUITMENT PRACTICES**

PMS undertakes “right to work” checks on all direct employees prior to them commencing their roles with the Company. This includes checking, where applicable, that the employee has a valid work visa/right to work and is of an appropriate age to work and is in possession of their own legal and identity documents.

## **ACCESS TO REMEDY FOR VICTIMS**

If PMS personnel identify any potential signs of slavery, human trafficking or other human rights abuses, they are encouraged to report this to PMS management directly.

To date, PMS Group has received no reports of concerns regarding slavery or human trafficking in our operations. In the event that such issues were reported to us, we would undertake a thorough investigation into the concerns raised under the supervision of The Legal & Compliance Team.

## **TRAINING ON SLAVERY AND HUMAN TRAFFICKING**

A modern slavery briefing sheet has been provided to all employees and is contained in the Staff Handbook.

Training has been delivered to those individuals in roles most likely to be in a position to identify and address potential modern slavery risks, including our Human Resources and Purchasing functions.

## **RISKS OF SLAVERY AND HUMAN TRAFFICKING IN PMS’ OWN OPERATIONS**

We have undertaken an assessment of slavery and human trafficking risks within PMS’ own operations. We considered the location of our operations; roles being performed; recruitment processes; and absence to date of reports of concerns regarding slavery and hum trafficking.

As well as direct employees, PMS has agency and contract staff working at our sites.

Based on our risk assessments, we deem the risk of slavery or human trafficking occurring within the PMS direct employee population and agency population to be nil.

### **ASSESSMENT OF RISKS OF SLAVERY AND HUMAN TRAFFICKING IN PMS SUPPLY CHAINS**

We have undertaken an exercise to assess slavery and human trafficking within PMS supply chains. We have evaluated our suppliers by considering the countries where our suppliers are based, products and services being supplied and the volume of spend.

From our assessment to date, considering the type of commodity or service being provided and the country in which the suppliers are based we consider suppliers in China, Taiwan and India may potentially represent a slightly elevated risk of slavery or human trafficking.

We seek assurances from these suppliers that they have effective procedures to protect their staff from slavery and human trafficking risks and are not aware of any current issues.

### **RELATIONSHIP WITH SUPPLIERS**

PMS actively manages its relationships with its suppliers. There are clear contractual arrangements in place with all direct suppliers, who are required to sign up to PMS Terms and Conditions and Ethical Policy.

### **EXPECTATION OF SUPPLIERS**

The standards PMS expect its suppliers to meet, including standards equivalent to those articulated in the Code, are set out in the Ethical Policy Statement.

If we become aware of slavery or human trafficking concerns within our supply chain we would seek to work with the relevant suppliers to improve conditions. We will deselect suppliers if they fail to comply. To date, the PMS Group is not aware of any reports of slavery or human trafficking within the supply chain.

### **BREACHES OF THIS POLICY**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

### **APPROVED BY THE BOARD OF DIRECTORS**

### **FOR FINANCIAL YEAR ENDING 2017**