

**SLAVERY AND HUMAN  
TRAFFICKING STATEMENT  
2024 – 2025**

## Introduction

This statement sets out the actions of Vision Linens Ltd. to understand all potential modern slavery risks related to our business and to put in place steps which are aimed at ensuring, where reasonably practicable, that no slavery or human trafficking occurs within our own business and our supply chains.

As part of our global supply chain, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Vision is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations, our supply chain, and our products.

We realise that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse. Therefore, throughout this statement, we, Vision Linens Ltd. use the term 'slavery and trafficking' to encompass all these various forms of coerced labour.

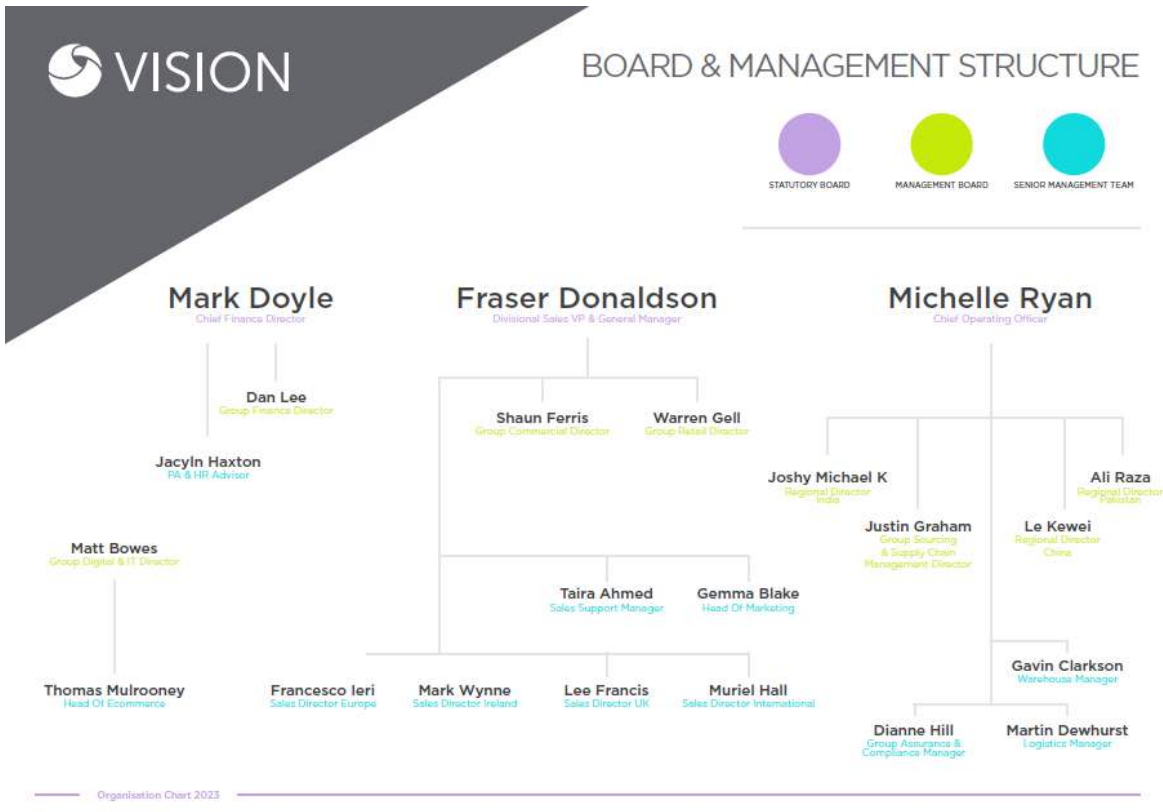
As outlined in detail below, we take certain steps to ensure that slavery and human trafficking are not taking place in our supply chains or other parts of our business.

To this end, we have established an integrated approach to managing human rights across our business, including risks related to slavery and trafficking.

This statement covers the activities of Vision Linens Ltd:

Vision is the leading supplier and distributor of luxury, performance and specialist textiles in the global accommodation, retail, and public sector markets.

## Organisational Chart



## Countries of Operation and Supply

The organisation currently operates in the following countries:

- United Kingdom
- Ireland
- India
- Pakistan
- China
- Turkey
- Dubai

We assess whether activities or countries are a higher risk in relation to slavery or human trafficking by undertaking a stringent risk assessment process in relation to our operations inside and outside the UK:

- Firstly, by an initial written questionnaire to be completed by all our key suppliers, ensuring that they, the supplier, have strong anti-slavery or human trafficking policies in place, and these policies are enforced, and that they, the supplier (and their manufacturing/supply chains) are also fully compliant with the Modern Slavery Act of 2015.
- Secondly, by having our own premises and representatives in each country of supply which allows us to carry out spot checks on site and have ready access to on the ground

information which can be obtained to oversee this process. We also ensure that our Commercial Director and Operations Director regularly visit our supply partners.

- Thirdly, by independent audit of our suppliers through accredited auditing bodies (BSCI/SMETA).

## High Risk Activities

The following activities are considered to be at a higher risk of slavery or human trafficking:

The manufacture and production processes for our product lines is not UK based, so any workforce involved in this manufacturing process could potentially be exploited/be at high risk in relation to slavery or human trafficking, thus failing to meet one or more areas of policy and so not being compliant with the Modern Slavery Act of 2015. Our Labour Standards Assurance System, which is third party verified via EcoVadis plus our physical presence in countries from which our products are sourced and manufactured are used to mitigate this risk.

Within the UK we have used the information on specific industries provided by the Gang Master and Labour Abuse Authority to check that there is no sign of Slavery and Human Trafficking within the following areas:

- Cleaning
- Manufacturing
- Retail and Sales
- Re-cycling and Waste Disposal
- Transports and Couriers
- Warehouse and Distribution

## Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- Our Group Assurance and Compliance Manager is responsible for putting in place any anti-slavery initiatives/human trafficking policies. They are also responsible for the regular review of these policies and the processes by which they were developed/are being developed to be within guidelines.
- Our Group Assurance and Compliance Manager has broad organisational responsibility for human rights and modern slavery risk analysis, looking at processes/ongoing reviews/regular actions in this area to ensure compliance, meeting the requirements of the act.
- The Chief Operating Officer has responsibility to ensure we meet our anti-slavery and human trafficking policies and is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. This is achieved by the undertaking of reviews of the supplier's statements of compliance. Steps are taken to verify, evaluate and address risks of slavery of any form in the supply chain.

## Training

Vision has provided training to key staff with responsibility for compliance to the Act.

All new starters within the organisation are briefed on our Compliance Statement Slavery and Human Trafficking Act. Further training is made available via SMETA online training courses targeted dependent upon the individual's role within the business.

## Relevant Policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy**  
The organisation encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can report it in a number of ways either by using the Modern Slavery Website <https://www.modernslaveryhelpline.org/report> or by calling 0800 0121 700 or by following our Whistleblowing Policy.
- **Employee code of conduct**  
The organisation's code is outlined in the Corporate and Social Responsibility Policy and our Employee's Handbook makes clear to all employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour at all times.
- **Supplier/Procurement code of conduct**  
The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. We require all chains of supply/procurement routes to complete a statement of compliance in relation to the Modern Slavery Act 2015.
- **Recruitment policy**  
The organisation uses only specified, reputable employment agencies to source our labour and always verifies the practices of any new agency we may wish to work with, before accepting any workers or placing recruitment requirements for employees from that agency.
- **Any other policies relevant to the organisation's business or sector**

Our organisation has a policy, as outlined in our Employee's Handbook, that remuneration is above the minimum wage level. We ensure all employees have the right to work in the United Kingdom.

As part of our labour standards assessment, we also ensure that our suppliers are paying their workers in accordance with local legislation.

## Due Diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks of each new supplier. We undertake a full review of all new suppliers, requiring their written statement of compliance to the Modern Slavery Act of 2015, giving 30 days maximum notice to provide a statement of compliance.
- Seeking demonstration of effective modern slavery and human trafficking policies and practices to be in place before beginning trading.
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- Conducting supplier audits and assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- Third party SMETA and BSCI audits used for risk mitigation.
- Reviewing of previous independent reports (SMETA, BSCI) to look at trends, improvements, or areas for improvement.

## Performance Indicators

### Indicators 2017

The organisation has reviewed its key performance indicators (KPIs) considering the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- Requiring designated staff to have completed training on modern slavery by August 2017. This was successfully completed by July 2017.
- Reviewed the system for supply chain verification. This has been completed.
- Reviewed our existing supply chains.

### 2018

We will look to analyse and review the micro, service, and textile industries. Formulating action plans that will aid us in understanding the problems and potential issues in these sectors and working through mitigations with our suppliers.

Update: This review was undertaken. A lack of understanding of the provisions of the Act and a lack of knowledge that this had entered the statute books has resulted in a lack of understanding when the review took place. This has been addressed with our micro suppliers and although the probability in the sector remains high, we firmly believe that within this sector of our supply chain, no modern slavery exists.

### 2019 to 2020

We will continue our work from 2018 and review all sectors that are not seen as low risk areas. Action plans and communication initiatives to be developed to be able to proactively look at these sectors.

Update: 2019 has seen us able to review our suppliers where further analysis was required. Within these sectors, micro, service and textile industry, the main inhibitor has been awareness to the 2015 Act.

When further questioned, examples of good practice were found within the micro businesses including:

- Checks on employment
- Not using agencies
- Long staff retention periods
- Payments at minimum wage rate

Within the service sector we have been able to look to ensure that due diligence checks have taken place and have also visited sites to review operations.

The textile sector remains a high-risk activity. Consequently, a full review will now commence in 2020.

### 2020

A full review will commence in the third and fourth quarter of 2021. This has been due to the worldwide pandemic.

### 2021

Due to the pandemic a review only commenced in quarter four. This will roll over into quarter 1 2022 and be completed by quarter two. This will be published next year with actions taken from the findings.

2023 the review was validated and published.

2024 A new review is due to take place this year.

## Indicators 2022 to 2024

The below conclusion has aided the establishment of indicators going forward.

Sector	Probability in Sector	Probability in Geographical	Overall Risk	Action
Finance	Low	Low	Low	Keep Under Review
Micro	High	Medium	High	Further Analysis Required
Service Industry	High	Medium	High	Further Analysis Required
Logistics	Medium	Medium	Medium	Keep Under Review
Textile	High	High	High	Further Analysis Required
Hire Companies	Medium	Medium	Medium	Keep Under Review
Auditors	Low	Low	Low	Keep Under Review

Full review completed and findings can be found embedded below.



Presentation - EEA  
Supply Chain 2022.p

## Awareness Raising Programme

It is our intention during the next financial year to raise awareness of modern slavery issues by ensuring staff are aware of the programme. This will be facilitated using the WestPoint sustainability newsletter. Staff are also made aware of the actions taken when they review our EcoVadis rating under labour and human rights where it is shown that we operate above the average score for those in our industry. We use our EcoVadis reports to allow our stake holders to understand our position in the marketplace.

Modern slavery awareness is also embedded for all staff within the company's induction programme.

We explain to staff:

- The basic principles of the Modern Slavery Act 2015
- How employers can identify and prevent slavery and human trafficking
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation.
- What external help is available, for example through the Modern Slavery Helpline



## Board Approval

This statement has been approved by the organisation's Chief Operating Officer

Signature: M Ryan

Director: Chief Operating Officer

Date:01.04.24