

Introduction - About Trutex & key facts



LAST PUBLISHED TURNOVER £33.9m (2019)



NUMBER OF GARMENTS **MANUFACTURED**

Approximately 4 million per annum



SOURCING

UK team and satellite offices in Shanghai (China), Dhaka (Bangladesh) and Colombo (Sri Lanka)



DISTRIBUTION

2 UK-based warehouses in Clitheroe, Lancashire and Bradford, Yorkshire



700 retailers

NUMBER OF EMPLOYEES

FTE equivalent -

UK and overseas 180





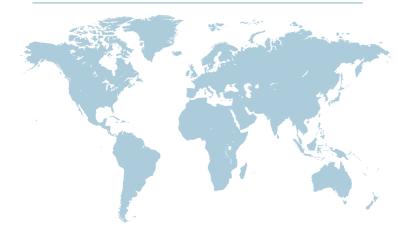
Six wholly owned stores trading as Clive Mark in the West Midlands



OWNERSHIP STRUCTURE

Privately owned by two shareholders and the senior management team

CUSTOMERS IN OVER 29 COUNTRIES



PRODUCTS DISTRIBUTED THROUGH:

Online, direct to

As a responsible and ethical business, Trutex has a zero-tolerance approach to all types of modern slavery and human trafficking within our business and supply chains. We are members of SEDEX and actively endorse and adopt all base codes within the ETI structure and monitor this though regular auditing (SMETA, BSCI & by Trutex staff) and working with all suppliers within our supply chain.

This statement has been published in accordance with the Modern Slavery Act (2015). It provides information on our activities and commitments to prevent modern slavery in our business operation and supply chains.

Trutex Supply Chain

Trutex is committed to establishing long term partnerships with our suppliers. Long term manufacturing relationships result in reliable supply and consistency of product quality. Trutex manufactures garments in 20 (Tier 1*) factories globally, centred in five key manufacturing locations:



10+ **YEARS** Relationship with 20% of our factories

5+ YEARS Relationship with 60% of our factories

We focus on having long term relationships with the factories that manufacture Trutex products on our behalf and work cooperatively with local management teams to understand the changing dynamics of each local market. Trutex monitors via our local office the cost of living, minimum wage, local regulations, and the local market infrastructure.

independent audits.

No sub-contracting of production is allowed at any time, unless expressly requested in advance and approved by Trutex following a detailed review process. Any sub-contracted factory is subject to all the same standards and approvals as a tier one factory. Trutex visits and authorisation of sub-contracting and annual

Production unit	Country	Local Trutex office	SEDEX member	Audit type	Signed Anti-Bribery statement	Bangladesh Accord Member**
1	Bangladesh	~	~	SMETA	v	Registered
2	Bangladesh	'	~	SMETA	~	Registered
3	Bangladesh	'	'	SMETA	v	Registered
4	Bangladesh	'	~	SMETA	~	Registered
5	Bangladesh	'	~	SMETA	~	Registered
6	Bangladesh	'	~	SMETA	~	Registered
7	Bangladesh	v	~	SMETA	~	Registered
8	Bangladesh	v	~	SMETA	~	Registered
9	China	v	~	SMETA	~	N/A
10	China	v	~	SMETA	~	N/A
11	China	v	'	SMETA	'	N/A
12	China	'	~	BSCI	~	N/A
13	China	'	~	BSCI	~	N/A
14	China	'	~	BSCI	~	N/A
15	Indonesia	-	~	SMETA	~	N/A
16	Sri Lanka	~	~	SMETA	'	N/A
17	Sri Lanka	'	~	SMETA	v	N/A
18	Sri Lanka	~	~	SMETA	v	N/A
19	Sri Lanka	~	~	SMETA	v	N/A
20	UK	~	~	SMETA	v	N/A

^{*}Tier 1 suppliers defined as Production units where there is the assembly and manufacture of Trutex garments. Tier 2 is currently being mapped.

^{**} The Accord is an independent, legally binding agreement between brands and trade unions to work towards a safe and healthy garment and textile industry in Bangladesh. The Accord covers factories producing Ready-Made Garments (RMG) and at the option of signatory companies, home textiles and fabric & knit accessories. Accord activities will be handed over to the Bangladesh RSC (Readymade Sustainability Council) created by the BGMEA in 2020.

Tier Assessment Plan/Status:

TIER 1 - Production units. Assembly and manufacture of Trutex Garments: Fully Mapped

TIER 2 – Material Production. (e.g., fabric, trims, embroidery) Anything that goes directly into our finished product: 80% mapped – completion by the end of 2021.

TIER 3 - Raw materials. Fibre farming/production: Initial stages relating to cotton sourcing.

PROFESSIONAL AFFILIATIONS AND ASSOCIATIONS



ETI Membership

Trutex are proud to be a foundation stage member of the Ethical Trading Initiative (ETI), a leading alliance of companies, trade unions and NGOs that promotes respect for worker's rights around the globe.



Slave Free Alliance Membership

A leading global charity working towards a slave-free supply chain.



SEDEX Membership

One of the world's leading ethical trade service providers, working to improve working conditions in global supply chains.



Schoolwear Association Membership

A trade organisation representing the interests of school uniform stakeholders.

Trutex Policies and Code of Conduct:



ETHICAL STATEMENT

Trutex is committed to Corporate and Social Responsibility and as part of this have an ethical sourcing strategy ensuring each factory meets all aspects of ETI (Ethical Trading Initiative) base code.

As a member of the Sedex Organisation and Foundation member of the ETI Trutex is focused on continuous improvement within the supply chain, through the implementation of both internal and SMETA social compliance audits.

Adherence to the ETI base code throughout our supply chain is monitored through our Sedex data monitoring and third party SMETA ethical auditing of suppliers. This is supported by our head office and local in-country offices, ensuring ensure standards are met and opportunities for improvement identified.

Trutex manages a range of initiatives to help us act responsibly and align our operations to our business aims, where we seek to:

- Act in an ethical manner
- Develop long term positive relationships with suppliers
- Be responsible for our impact on the environment
- Deliver value to our customers
- Take care of our employees
- Support charitable initiatives and community projects

Adherence to the ETI base code throughout our supply chain is monitored through our audit programme along with support from our head office and in-country local offices to ensure improvements are met. As a foundation member Trutex is working on developing training and support toolkits for our in-country offices and partner suppliers.



SUPPLIER/BUYER CODE OF CONDUCT

Our suppliers are contracted to abide by our supplier code of conduct, which is in line with International Labour Organisation Conventions and the ETI Base Code. This provides comfort that we work with only compliant suppliers to protect our own workers, as well as those of our supply chain.

All Tier 1 suppliers have been issued with copies of our current code of conduct and these requirements form part of the annual supplier manufacturing agreement.



WHISTLEBLOWING POLICY

In the UK, we conduct right to work checks and have an updated whistle-blowing policy and process whereby employees can raise any concerns they may have in total confidence. The whistleblowing policy has been last reviewed during 2020, with improved clarity on escalation procedures and is published within the employee handbook on a mandatory read basis.

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RESPONSIBLY SOURCED COTTON

Consistent with our commitment to ensure that the people making our products are treated with dignity and respect and work in safe and healthy conditions, Trutex does not source cotton lint, fibre and associated textile materials from Uzbekistan, Turkmenistan, and Uyghur Region (China) for our products, and will not do so until there is clear evidence that action is being taken to eliminate the use of forced labour, child labour, and human rights abuses in the cotton Industry.

Trutex works with our suppliers to trace the sources of cotton fibres and where appropriate we seek documentary evidence to support the transparency of our supply routes. All relevant tier 1 and tier 2 factories have received our cotton policy and provided assurances through a self-certification process.



ANTI-BRIBERY & CORRUPTION POLICY

Trutex's policy has been and continues to be that all personnel, agents and clients of Trutex must comply strictly and in good faith with the letter and spirit of all applicable laws and regulations in any location in which Trutex transacts business. We consider compliance with anti-bribery laws to be more than a legal requirement; compliance is also a reflection of how Trutex's company values are embedded.

Our anti bribery and corruption policy is issued to all staff, across all Trutex in-country locations and head office. The policy is issued to all Tier 1 and 2 suppliers as part of the new supplier onboarding process. A copy of all our policies can be viewed on our website: www.trutex.com



DUE DILIGENCE, RISK ASSESSMENT AND FUTURE ACTIONS

Trutex has recognised the need to develop and deliver anti-modern slavery initiatives in its business and supply chain and improve modern slavery mitigation.

To assist with reviewing and improving upon our existing policies, Trutex became members of the Slave Free Alliance in 2019. As members we gain insight and advice from the SFA about knowing what to look for and how to be prepared and protected against slavery within our supply chain.

In 2020 we have carried out a group wide gap analysis review and identified key areas for improvement. This process has highlighted the requirement to complete the tier 2 mapping to provide improved visibility across the supply chain. The actions resulting from this process are ongoing.

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TRAINING AND AWARENESS

Further Executive leadership training will be carried out during 2021. This will be followed by training plans for UK staff and offshore teams to explain what modern slavery is and recognise the types of exploitation most likely to affect Trutex Ltd. This will commence in the second half of 2021.

Approved for and on behalf of the Board of Trutex Limited

Matthew Easter



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