

Refined Brands

**MODERN
SLAVERY ACT**

Transparency Statement

2024-2025

Introduction

The Refined Brands Group's first Modern Slavery Statement has been published in accordance with section 54 of the UK Modern Slavery Act 2015. It describes the activities we have undertaken to identify and prevent modern slavery and human trafficking within our businesses and supply chains for our financial year ending January 2024 and sets out our commitments for 2024.

Modern Slavery is a crime and defined as the exploitation of an individual by others for personal or commercial gain. This can include forced labour, child slavery, human trafficking and forced marriage, all of which are associated with the loss of an individual's freedom.

We have become eligible to report under this modern slavery legislation and fully support legal mandates to extend greater protection measures to workers at risk of exploitation.

We aim to conduct working relationships in an ethical, honest and transparent way and to have zero tolerance for any form of modern slavery anywhere within our operations or supply chain. In alignment with the UN Guiding Principles on Business and Human Rights, we are committed to operating our business in a way that respects and protects the rights of our employees, contractors, supply chain workers and any other people that contribute to, or are affected by, our operations.

Group Structure

Refined Brands

Refined Brands is the leading digitally-native portfolio of ethically sourced, natural and sustainable British brands. The group was incepted in 2021 with the acquisition of Celtic & Co. and expanded via the subsequent acquisitions of Turtles Doves, Frugi and Kettlewell Colours in 2022.

CELTIC & CO.

Celtic & Co. was started by Nick & Kath Whitworth in 1990, initially manufacturing sheepskin footwear from their factory base in Newquay. They have since expanded and now sell a wide variety of adult clothing and footwear, specialising in sustainable fibres, from their bases in Newquay and Indian Queens, Cornwall. It is a private limited company registered in England and Wales under the registration number 15620291



Frugi was established in 2004 by Lucy & Kurt Jewson with the intention of sourcing colourful organic childrenswear, initially run from a bedroom in their family home in Helston, Cornwall. Frugi has expanded and sells a varied range of sustainable childrenswear, now operating from offices and warehouse in Indian Queens, Cornwall. It is a private limited company registered in England and Wales under the registration number 11953610.

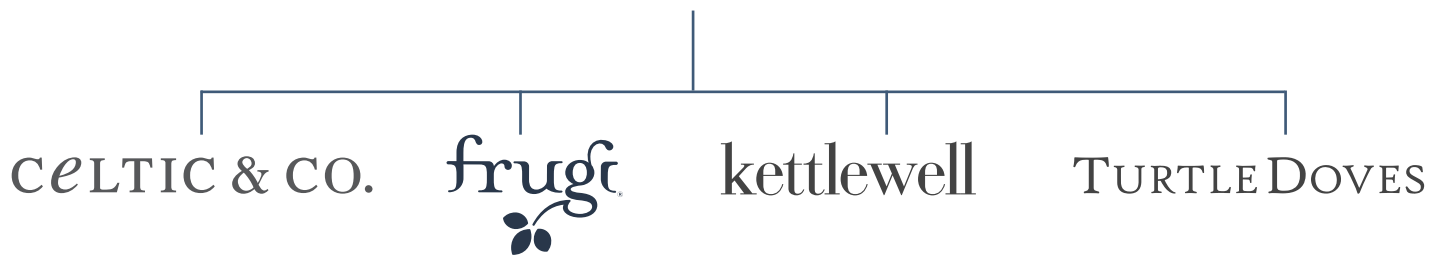
kettlewell

Kettlewell Colours was established in 2004 by Melissa and John Nicholson in Somerset. They offer clothing and accessories in a wide variety of colours, encouraging customers to understand their optimum colours and therefore reduce waste through unsuitable purchases. They now operate from larger premises in Cricket St Thomas, Somerset. It is a private limited company registered in England and Wales under the registration number 05108080.

TURTLE DOVES

Turtle Doves was established in 2009 by Kate Holbrook in Shrewsbury, initially selling gloves and handwarmers made from recycled cashmere jumpers at a school fair. They now make a wide variety of accessories, all of which are 100% recycled and produced in the UK. It is a private limited company registered in England and Wales under the registration number 07101023.

Refined Brands



Facilities

Cornwall
(Indian Queens)

Head Office & Warehouse
Celtic & Co., Frugi and
Turtle Doves.

Cornwall
(Newquay)

Offices & Factory
Celtic & Co.
and Turtle Doves

Somerset
(Cricket St Thomas)

Offices & Warehouse
Kettlewell

Supply Chain Overview

We pride ourselves on building long-term, fair relationships with suppliers that reflect our company ethos of putting people and planet first.

Product Suppliers

cELTIC & CO.	frugt	kettlewell	TURTLE DOVES
<p>Long-term Relationships (2yrs+)</p> <p>UK 7 suppliers, 17 factories</p> <p>Portugal 5 suppliers, 8 factories</p> <p>Romania 1 supplier, 4 factories</p> <p>Morocco 1 factory</p> <p>Spain 1 supplier, 1 factory</p> <p>Italy 2 suppliers, 1 factory</p>	<p>Long-term Relationships (2yrs+)</p> <p>India 5 suppliers, 5 factories</p> <p>China 2 suppliers, 4 factories</p> <p>Sri Lanka 2 suppliers, 4 factories</p> <p>Portugal 1 supplier, 1 factory</p> <p>Vietnam 1 supplier, 1 factory</p>	<p>Long-term Relationships (2yrs+)</p> <p>Turkey 2 suppliers, 2 factories</p> <p>Italy 1 supplier, 1 factory</p> <p>Portugal 3 suppliers, 3 factories</p> <p>China 1 suppliers, 1 factory</p> <p>India 2 suppliers, 2 factories</p> <p>Tunisia 1 supplier, 1 factory</p>	<p>Long-term Relationships (2yrs+)</p> <p>UK 8 Suppliers</p> <p>UK 1 factory</p>
<p>NEW Relationships (Less than 2yrs)</p> <p>Portugal 3 suppliers, 5 factories</p> <p>Italy 1 supplier, 1 factory</p> <p>Bulgaria 1 supplier, 3 factories</p> <p>Greece 1 supplier, 2 factories</p> <p>Romania 1 supplier, 1 factory</p>	<p>Frugi’s products are all manufactured by third-party suppliers, three quarters (75%) of these factories are GOTS certified. This is the world leading standard for the textile industry promoting organic supply chains and encompassing both ecological and social criteria.</p> <p>Frugi, Celtic & Co. and Kettlewell use agents to provide in-country oversight and specialist skills including regular observational audits, trouble shooting and policy support.</p> <p>Celtic & Co. and Turtle Doves are proud of their UK manufacturing heritage, with in-house production facilities and sourcing in the UK.</p> <p>Turtle Doves works with small hub groups who are regularly visited and audited. We run annual refresher training and regular studio meetings to discuss quality, standards and policies.</p>		

Goods not for resale

Goods and services such as packaging, travel, IT, utilities, office consumables, marketing and PR are classed as ‘goods not for resale’. These suppliers are subject to our Preferable Purchasing Policy, but it is recognised that this does not explicitly cover Modern Slavery requirements.

Policies

Governance

Our Directors are responsible for overseeing the Group's approach to human rights, including modern slavery prevention. They are supported by the Group's Directors, People and Culture Managers and relevant Quality, Purchasing and Supply Chain Managers. Refined Brands Board meet monthly to discuss ESG performance and related issues.

Each brand has People & Culture and Buying & Supply teams who are responsible for the day-to-day management of our human rights programmes and for implementing our modern slavery related policies and procedures. Supplier liaison teams have weekly catch ups to discuss supply chain related issues.

We acknowledge that the textile industry is particularly high risk for modern slavery due to the way workers are recruited and managed within fashion supply chains. Through supply chain mapping, desk-based research, visits, audits and external expert engagement we recognise that our product supply chains contain the most significant risks, so this is where we are currently focusing our modern slavery prevention efforts.

Business Policies

One of the ambitions of our ESG strategy, is to inspire, enable and support our team to develop, grow and feel fulfilled in their roles whilst developing a culture of diversity and inclusion. Our human rights policies and procedures, managed by the People and Culture teams, are central to achieving this ambition.

The Group's Policies and Procedures Handbooks contain the following human rights related policies:

- **Anti-Bribery and Corruption Policy.**
- **Anti-Harassment and Bullying Policy.**
- **Code of Ethics Policy.**
- **Disciplinary and Capability Policy.**
- **Equal Opportunities, Diversity and Inclusion Policy.**
- **Flexible Working Policy.**
- **Health and Safety Policy.**
- **Grievance Policy.**
- **Modern Slavery Policy.**
- **Whistleblowing Policy.**
- **Homeworking Policy.**
- **Lone working Health & Safety assessment.**

All employees are given access to the People Book and the Policies and Procedures Handbook during their induction and directed to a live Teams site or Sage HR. The Group also provides employees with annual Equality, Diversity and Inclusivity training along with the opportunity to take part in an annual staff satisfaction survey.

International laws are observed for all international employees.

Supply Chain Policies

We have a suite of Global Sourcing Principles that all Refined Brands Group product suppliers sign up to as part of their Supplier Contract with us, which includes modern slavery related clauses on child and forced labour as well as working hours and voluntary overtime. Suppliers are required to be compliant with all ILO and ETI Base Code principles in addition to all local laws.

Suppliers are required to cascade these standards and monitor compliance against them throughout their own supply chains. We provide support to understand our standards as and when required.

Progress to date:

- **Onboarding and audit protocols established.**

2024/25 Commitments:

- **Publish first Modern Slavery statement.**
- **Develop Child Labour and Young Worker Policy.**
- **Strengthen Global Sourcing Principles in relation to Modern Slavery.**
- **Create a position statement on cotton sourcing.**
- **Formalise Lone Working Policy to include Outworkers.**
- **Incorporate Modern Slavery related topics/indicators into supplier reviews.**
- **Ensure employment policies are standardised within Group.**

Due Diligence

New supplier on-boarding

Suppliers are required to complete a supplier and factory questionnaire and provide a recent ethical audit, no older than 12 months, carried out under SMETA, SA8000 or BSCI audit standards. We then grade the factory based on their responses and audit results. The grade determines how frequently we ask for follow up audits from the site going forward. If the factory has no critical or major issues, we will work with them to close off any outstanding non-compliances as we go through the on-boarding process with them.

Where possible, we send Group personnel to visit any new sites we are considering working with. If the site is based in India or Sri Lanka, we will send a member of our Quality Control team, who has been trained in Group sustainability requirements, to the factory to perform a top-level review against our standards.

Turtle Dove's largest raw material supplier has robust Modern Slavery policies which cover all of its production units.

Maintaining Supplier Standards

Once commissioned, the UK Buying, Production, Design and Technical teams are in regular email, in-person and phone contact with our supply base. We require all Tier 1 factories to have a social audit annually. Factories submit annual reports along with Corrective Action Plans to address all non-compliances. These are then recorded and monitored until completion.

Frugi use supplier scorecards to inform commercial decisions and provide regular oversight of our working relationships with suppliers.

Celtic & Co. annually gather and refresh supplier data on a variety of criteria which include Modern Slavery training records.

Supplier Visits & Support

The Frugi in-country QC team in India continue to provide an on-the-ground presence to help us foster relationships and to respond quickly and effectively to any issues or help close off any non-compliances, should the need arise.

Celtic & Co. agents are required to sign the same agreement as suppliers so also bound to support Celtic & Co. in reporting any concerns or non-compliances.

Kettlewell visit most of their suppliers in person and use the support of agents for the remainder.

Remediation

When suppliers are not able to meet our standards, we work with the supplier and the factory to close off the non-compliances within an agreed timeframe. Our teams ask factories to send through evidence that issues have been resolved. We will revisit sites more frequently to provide guidance if we believe insufficient progress has been made.

Progress to date:

- **Tier 1 finished goods suppliers mapped.**
- **Tier 2 mapping started.**
- **Sourcing Principles and supplier manuals created and circulated for Frugi, Celtic & Co. and Kettlewell.**

2024/25 Commitments:

- Ensure new product supplier on-boarding process is consistent within Group.
- Standardise Modern Slavery policy documents across all brands.
- Complete Tier 1 mapping for factory raw materials.
- Continue to map Tier 2 suppliers across all brands.
- Formalise Goods not for resale supplier procedures, assess risk and contracts.

Risk Assessment

Supply Chain

From our own risk assessments of our main sourcing regions, we know the following modern slavery related issues and indicators could potentially be present in our supply chain:



- **China** – Presence of Uyghurs and other Turkic and Muslim-majority people, child labour.
- **India** – Restrictions placed on movement, retention of identity documents, withholding of wages, excessive overtime, debt bondage (agricultural sector), recruitment agencies and fees.
- **Portugal** - Illegal migrant workers, workers without appropriate paperwork and contracts, excessive working hours.
- **Sri Lanka** – Low wages, excessive overtime, accommodation located in isolated places, informal, unregistered businesses.
- **Turkey** – Syrian refugees, illegal migrant workers, casual workers employed through intermediaries, child labour and involuntary overtime.
- **Pakistan** – Poor Health and Safety compliance, involuntary overtime.
- **Vietnam** – Human trafficking, child labour, forced labour.
- **UK Homeworkers** – Illegal workers, child labour, retention of identity documents.

We pay increased attention to these risks when selecting and training suppliers and when visiting factories.

We are also aware of the increased human rights risks associated with temporary seasonal labour and homeworkers within our supply chains.

We remain aware of current global risks via membership of trade bodies such as UKFT, Intertek etc.

Operations

Most of our employees are directly employed by us on permanent contracts so we believe the risk of modern slavery within our own operations to be low. Our warehouse and cleaning companies may use agency workers from time to time, who due to the nature of their recruitment and employment, may be more vulnerable to exploitation. This is mitigated through the use of authorised agencies only.

Progress to date:

- **Assessed risk profile of individual countries based on Global Slavery Index.**
- **Written confirmation that no cotton is sourced from Xinjiang Uygur Autonomous Region (XUAR) region, Turkmenistan & Uzbekistan.**
- **Confirmation that no products are sourced from Chinese factories where external reports have indicated that trafficking or forced labour of Uyghur and other Turkic and Muslim-majority people has taken place.**
- **Homeworker audits completed.**

2024/25 Commitments:

- **Develop modern slavery supply chain tools and assessment protocols to use during site visits.**
- **Work with suppliers to improve Modern Slavery awareness and benefits of robust policies.**
- **Map vulnerable worker groups.**
- **Assess agency worker risks.**
- **Assess risk associated with factories/suppliers without recognised social audit and associated action plan.**
- **Create Modern Slavery nonconformity reporting mechanism.**

Training & Capability Building

Employees

Some of our brands deliver annual equality, diversity and inclusion training. As part of this training, we provide training on modern slavery assessment protocols that we can deploy when selecting suppliers, visiting factories and recruiting employees and homeworkers.

Suppliers

Our teams provide support and guidance to suppliers during regular calls. We have a regular seasonal pattern of factory visits allowing us the opportunity to further raise awareness of our supplier standards and of modern slavery related issues.

Progress to date:

- **Frugi has run a modern slavery training session for colleagues with supply chain responsibilities.**
- **Celtic & Co. & Frugi have undertaken internal Modern Slavery awareness via Atlas training app.**

2024/25 Commitments:

- **Ensure all brands complete internal annual modern slavery training process – to include elevated awareness for supplier facing colleagues.**
- **Incorporate human rights related policies in to the induction process for new employees.**
- **Develop an annual modern slavery awareness training process for suppliers and agents.**

Effectiveness of our approach

We fully acknowledge our modern slavery prevention programme needs to continue to evolve. We have not found any direct incidences or potential indicators of modern slavery within our business or supply chain, nor have we had any related grievances reported. We are committed to building our internal expertise and refining our approach, so we are in a stronger position to detect and prevent modern slavery.

Key Objectives

A summary of our 2024/25 commitments can be found below:



- **Publish first Modern Slavery policy.**
- **Standardise onboarding protocols and policies across the group.**
- **Standardise Modern Slavery policy documents across the group.**
- **Develop group Modern Slavery reporting tools.**
- **Roll out internal training within the group.**
- **Complete mapping of Tier 1 suppliers.**
- **Continue to map Tier 2 suppliers.**

We will update on progress made against these in our next Modern Slavery Statement.

This Modern Slavery Statement was reviewed and approved by Refined Brands Group's Board of Directors on 31st July 2024