



Certificate no: 11009



E&E Accessories Ltd
Modern Slavery Policy, Procedures, and Governance

Effective Date: 1.4.2024

1. Introduction

E&E Accessories Ltd is committed to ensuring that modern slavery and human trafficking have no place in our business or supply chains. As a small business operating in the manufacturing and retail sectors, we recognize our responsibility under the Modern Slavery Act 2015 to take proactive steps to prevent forced labour, exploitation, and unethical working conditions.

2. Purpose

This policy sets out our approach to:

- Identifying and mitigating risks of modern slavery in our business and supply chains.
- Ensuring compliance with the Modern Slavery Act 2015.
- Establishing clear procedures and governance to uphold ethical labour practices.

3. Scope

This policy applies to:

- All employees, workers, and contractors within our business.
- All suppliers, service providers, and business partners involved in the sourcing, production, and retailing of our products.

4. Responsibilities & Governance

We have a structured governance approach to prevent modern slavery:

4.1 Senior Management

- Responsible for policy oversight and ensuring compliance with the Modern Slavery Act 2015.
- Reviews modern slavery risks and takes necessary action to mitigate them.

4.2 Line Managers

- Ensure employees understand and follow modern slavery policies and procedures.
- Conduct risk assessments for manufacturing sites, warehouses.

4.3 Employees & Workers

- Expected to report any concerns related to modern slavery or unethical labour practices.
- Encouraged to undergo training to recognize signs of exploitation.



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5. Due Diligence & Risk Assessment

We implement a due diligence process to identify and mitigate modern slavery risks in our manufacturing and retail supply chains:

5.1 Supplier & Supply Chain Checks

- We conduct risk assessments for raw material suppliers, manufacturers, warehouses, and logistics providers.
- All new suppliers undergo ethical sourcing checks before entering into contracts.
- We require suppliers to sign agreements confirming compliance with modern slavery laws.

5.2 Manufacturing Operations

- We conduct internal audits of our manufacturing facilities to ensure fair working conditions.
- We ensure all workers receive fair wages and have access to grievance mechanisms.

5.3 Third-Party Certifications

- Where possible, we work with certified suppliers (e.g., those with SEDEX, SA8000, or Fair-Trade accreditation) to ensure ethical labour practices.

6. Training & Awareness

We provide training to employees to:

- Recognize signs of forced labour, child labour, and human trafficking.
- Understand their responsibilities in preventing modern slavery.
- Report concerns safely and confidentially.

Training is mandatory for:

- All factory, warehouse, store managers.
- Procurement and supply chain staff involved in sourcing products.

7. Reporting & Whistleblowing

We encourage employees, suppliers, and stakeholders to report modern slavery concerns through:

- Anonymous reporting forms available at Unit24, Red Lion Business Park, Red Lion Road, Surbiton. KT6 7QD

All reports are treated confidentially and investigated thoroughly. Retaliation against whistleblowers is strictly prohibited.



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8. Compliance & Monitoring

To ensure compliance, we:

- Conduct regular supplier audits to verify ethical labour practices.
- Review and update this policy annually to address emerging risks.
- Terminate relationships with suppliers found to violate modern slavery laws.

9. Consequences of Non-Compliance

- Employees found violating this policy may face disciplinary action, including dismissal.
- Suppliers who fail to meet modern slavery standards risk contract termination.

10. Approval & Review

This policy is reviewed annually and approved by:

Nadjat Tbahrithi
Director
E&E Accessories Ltd