



## **Geiger Statement Against Modern Slavery and Human Trafficking - 2024**

- **Introduction**

This statement is made on behalf of Geiger UK pursuant to section 54(1) of the Modern Slavery Act 2015 ('The Act') and constitutes our Anti-Slavery and Human Trafficking Statement for 2024.

Geiger UK is committed to social and environmental responsibility efforts to ensure that our supply chains are free from forced labor slavery and human trafficking. We encourage our associate and sales partners to report concerns and work with our vendors to ensure they carry out the necessary checks.

- **Organization Structure**

Geiger UK are distributors of promotional merchandise. We are a wholly owned subsidiary of Geiger Bros. (US) with our UK operations headquartered in Hayes, Middlesex, UK.

- **Supply Chains**

Our supply chain includes the sourcing, decoration, warehousing, and distribution of promotional products and apparel suitable for all promotional marketing requirements.

- **Our Policies on Slavery and Human Trafficking**

We are committed to ensuring that within our global network of operations there is no modern slavery, servitude or forced compulsory labor or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our accessible supply chains.

- **Due Diligence Processes for Slavery and Human Trafficking**

We have a robust system for monitoring our tier 1 supply chain through site visits; review of third-party audit reports; commitment to transparency and support from third-party organisations and membership bodies including SEDEX, ETI, Ecovadis and the United Nations Global Compact.

We have a zero tolerance for any factory that may be found to be engaged in human trafficking and modern slavery practices and all tier 1 suppliers abide by our ethical Code of Conduct which is based on the internationally recognized positive labor principles of the ETI Base Code.

For the lower tiers of our supply chains, we adopt a 'one up' process whereby our suppliers cascade the requirements of our ethical Code of Conduct through their own supply chains to demonstrate transparency and ownership and ensure compliance.

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Encourage the reporting of concerns and the protection of whistle blowers
- Where possible we build long standing relationships with our vendors to make clear our expectations of business behavior.

## Risk Assessment

We have conducted a risk assessment of the salient human rights risks according to the 2023 ITUC Human Rights Index that exist in our key sourcing regions for tier 1 preferred suppliers for further monitoring, awareness raising and control through due diligence steps.

**High-risk** sourcing regions in our supply chain include:

- Bangladesh - Risk Rating: 5
- Turkey - Risk Rating: 5
- China - Risk Rating: 5
- Pakistan - Risk Rating: 5
- Egypt - Risk Rating: 5
- India (New) - Risk Rating: 5
- UAE (New) - Risk Rating: 5

**Mid-risk** sourcing regions in our supply chain include:

- UK - Risk Rating: 4
- Poland - Risk Rating: 3

**Low-risk** sourcing regions in our supply chain include:

- Taiwan - Risk Rating: 2
- Spain - Risk Rating: 2
- Portugal - Risk Rating: 2
- Netherlands - Risk Rating: 2
- Germany - Risk Rating: 1

The most salient risks in our key high and medium risk sourcing regions of China, Bangladesh, Turkey, Pakistan include:

- High risk of health and safety issues in tier 1 and tier 2 factories
- Excessive working hours and involuntary overtime in tier 1 and tier 2 factories

- Informal child labour and lack of meaningful childcare options for parent workers in tier 1 and tier 2 factories
- Gender discrimination for female workers in tier 1 and tier 2 factories
- Restriction on freedom of association and genuine opportunities for collective consultation on the big issues for worker rights including working hours and pay.
- Modern slavery and illegal trafficking of migrant workers

According to the ITUC Global Rights Index, we currently only source products from 3 of the 10 worst countries for workers: Bangladesh, Egypt and Turkey, and our sourcing from Middle East is confined to one verified and audited partner distributing products imported into the region from low risk countries (no direct manufacturing).



Considering the risk ratings and business level for each sourcing region, we have focused our efforts on vendors and products supplied from the highest risk production areas of Turkey, Bangladesh, Egypt, China and Pakistan.

The majority of our preferred suppliers are also located in UK and Europe, who handle more than 80% of our regular business, where the average 2023 ITUC risk rating is low at 2.56 compared to the Asia Pacific region where the average risk rating is higher at 4.18.

As an organization, we consider that the main areas at risk of Modern Slavery are our subcontractors, and lower tier suppliers, and that the risk of Modern Slavery occurring in any of these areas is being proactively managed through honest and open vendor relationships, independent audits and the efforts of our compliance and risk management teams. We also work in collaboration with our suppliers in the spirit of transparency to report concerns and advise on best practices. Our employees also receive training as part of the onboarding process, to ensure they understand the importance of our Ethical Code of Conduct to help minimize the risk of modern slavery practices taking place within our supply chain.

## Supplier Adherence to our Values

We have a zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and suppliers comply with applicable laws, as well as our values and ethics, we have in place a supply chain compliance program.

We have a dedicated compliance and risk management team, which consists of involvement from:

- General Counsel
- Vendor Relations
- Compliance Officer
- Procurement Team - UK
- Senior Management Team - UK

## **Reporting on Internal Issues of Modern Slavery & Child Labor**

Geiger holds ourselves to the same high standards, expectations and obligations as the external suppliers in our supply chain. From our own internal SMETA audit, ISO audit and internal monitoring processes and robust HR management systems, **we are pleased to report that during 2023, zero incidents of modern slavery, forced labor or child labor were identified or reported within Geiger's own internal operations and workforce.**

## **Further Steps**

We will continue to keep under review our internal processes to identify what further steps can be taken to ensure that our obligations under the Act are met and that our Anti Slavery Policy is effectively implemented and complied with, so as to ensure that there is no slavery or human trafficking in any part of our business.

Some of the measures we continue to practice include:

- Continuing education of our employees to raise awareness of modern slavery
- Supplier evaluation program prior to on-boarding
- Continuing to review our procurement processes to identify opportunities to further reduce the level of risk of modern slavery and human trafficking in our supply chains
- Introduction and review of supplier KPIs to monitor performance
- Review of our supplier Terms & Conditions and Ethical Code of Conduct to ensure alignment with current best practice and salient risks