



# MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

“We are committed to protecting the planet and its people.”

ISSUE 4 • 2026



## OUR COMMITMENT

SMI maintains a zero-tolerance approach to all forms of modern slavery, human trafficking, forced labour, and exploitation. We recognise that these issues remain significant global challenges affecting many industries, including those in which we operate.

We are dedicated to ensuring that human rights are respected across all business activities, that our suppliers, contractors, and business partners uphold ethical and lawful labour practices, and that our internal policies, controls, and procedures remain effective, transparent, and subject to continuous improvement.

This commitment applies to all employees, suppliers, contractors, and third parties engaged in SMI's operations and forms an integral part of our approach to responsible business conduct and supply chain management.

**Blake Prisgrove**  
Chief Executive Officer



## INTRODUCTION

This statement has been published in accordance with the Modern Slavery Act 2015 and sets out the actions taken by SMI INT Group Limited and its entities during the period from 1 January 2025 to 31 December 2025.

Outlining the actions taken by SMI INT Group Limited ("SMI") and its regional entity, SMI Scotland (formerly LION, which was acquired by SMI and rebranded as SMI Scotland in January 2025), to prevent modern slavery and human trafficking within its operations and supply chains.

SMI INT Group Limited ("SMI") is a privately owned UK-based company sourcing, manufacture, distribution and branding of personal protective equipment (PPE), workwear, hygiene products and essential safety supplies. Specialising in the design, sales, and distribution of workwear and PPE products. We employ individuals directly and work with a wide network of organisations across our supply chain. SMI is fully committed to operating with integrity, transparency, and respect for human rights.

During 2025, SMI further strengthened its operational structure through the acquisition of Contego. Following the acquisition, all operations conducted at the Contego site were integrated into SMI's Fareham operations by June 2025. As part of this integration programme, all remaining Contego supply chain operations, with full closure achieved by the end of 2025.

These organisational changes have enabled SMI to enhance oversight, governance, and consistency in the application of its policies and procedures relating to ethical business practices, including the prevention of modern slavery and human trafficking throughout its operations and supply chains.

This statement will be reviewed annually and updated as necessary to reflect any changes in our operations, supply chain, or legal requirements.

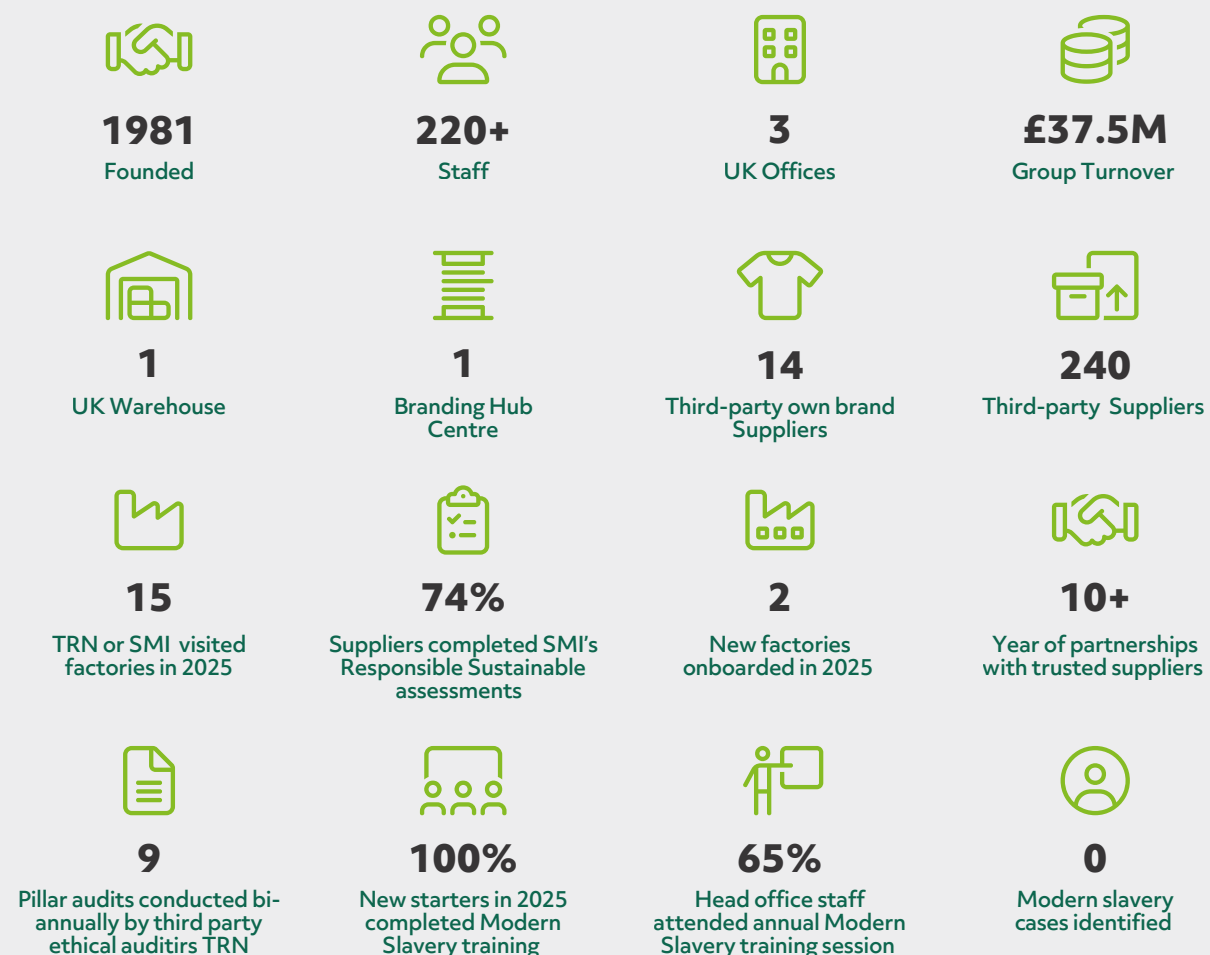
## OUR ORGANISATION AND STRUCTURE

SMI INT Group Limited ("SMI") is headquartered in the United Kingdom. Our head office is located in Petersfield (Vision House), with our national distribution centre (Kites Croft) and branding hub (Concorde Way) located in Fareham. SMI also operates from additional regional offices across the north of the UK.

As of January 2025, SMI employed approximately 220 people across its UK operations and was governed by a Board of eight directors. For the financial year ending December 2025, the Group reported a turnover of £45 million.

SMI (as of time of publishing June 2026) serves more than 1,200 customers across four principal sectors: Waste and Environmental Services, Public Sector, Industrial and Food Manufacturing Sector. Our product portfolio comprises over 5,100+ products across 50 product categories.

## SMI IN NUMBERS



## OUR SUPPLY CHAIN

SMI's supply chain encompasses a diverse network of business partners that support the design, manufacture, transportation, distribution and delivery of our products and services. This includes upstream suppliers of raw materials, textiles, plastics and manufacturing services, logistics partners involved in transportation and distribution, and downstream distributors and customers. We refer to these collectively as our business partners, encompassing all organisations that contribute to our value chain.

Where requested by customers, products are transferred to SMI's dedicated branding facility in Fareham, where logos and branding are applied through in-house embroidery and heat-transfer processes. Our branding centre located 1.6 miles from Kites Croft our distribution centre. Finished products are subsequently distributed throughout the United Kingdom. Deliveries within the South East are supported by SMI's own vehicle fleet, while nationwide distribution is undertaken through approved third-party logistics providers.

ROKWEAR®, launched in 2009, is SMI's proprietary workwear and PPE brand. Products are designed and developed by our UK-based team and manufactured by a network of approved supplier factories located in **China, Bangladesh, India, Italy and Pakistan**. Following manufacture, products are transported to the United Kingdom through Southampton Port and delivered to our Fareham distribution centre for storage and onward distribution.

In 2025, SMI launched ECOROKWEAR®, a sustainable product range developed as an extension of the ROKWEAR® brand. ECOROKWEAR® garments are manufactured using post-consumer recycled plastic bottles and carry either Global Recycled Standard (GRS) or Recycled Claim Standard (RCS) certification, depending on the composition of the garment.

# SMI INDUSTRY STANDARDS, CERTIFICATIONS & INDEPENDENT ASSURANCE

## AUDIT AND COMPLIANCE FRAMEWORK

SMI recognises that effective human rights due diligence extends beyond policy commitments and requires robust governance, independent verification and continuous monitoring throughout the supply chain. To strengthen our responsible sourcing programme and support the prevention of modern slavery, forced labour and unethical working practices, SMI works with manufacturing partners that hold recognised internationally accredited certifications and participates in independent third-party assessment frameworks.

As of June 2025, SMI's supply chain assurance programme incorporates the following recognised ethical and sustainability standards:

- SMETA (Sedex Members Ethical Trade Audit) – Independent ethical audits assessing labour standards, health and safety, environmental performance and business ethics.
- Sedex – Supplier engagement platform supporting supply chain transparency, responsible sourcing and risk management.
- WRAP (Worldwide Responsible Accredited Production) – Certification demonstrating compliance with internationally recognised standards relating to lawful, humane and ethical manufacturing.
- SA8000 Social Accountability Standard – An internationally recognised certification promoting fair labour practices, workers' rights and safe working conditions.
- EcoVadis Silver Rating – Independent assessment of corporate sustainability performance across environmental management, labour and human rights, ethics and sustainable procurement.

These recognised frameworks provide additional assurance that manufacturing partners are operating in accordance with internationally accepted standards and help SMI assess supplier performance across key areas including:

- Human rights and labour standards.
- Prevention of forced labour, child labour and modern slavery.
- Working conditions and employee welfare.
- Occupational health and safety.
- Environmental management and responsible manufacturing.
- Business ethics, governance and anti-corruption.
- Responsible sourcing and supply chain transparency.

Whilst certification alone does not eliminate supply chain risk, SMI considers independent third-party verification to be an important component of our broader due diligence framework. These certifications complement our supplier onboarding process, Supplier Code of Conduct, Responsible & Sustainable Supplier Questionnaire, independent factory audits undertaken by The Reassurance Network Group (TRN), ongoing supplier engagement and risk-based monitoring.

By combining internationally recognised certification schemes with independent auditing and continuous supplier improvement, SMI seeks to strengthen supply chain resilience, improve transparency and reduce the risk of modern slavery occurring within our own-brand manufacturing operations.

## OWN-BRAND PRODUCTION SUPPLIERS (ROKWEAR® & ECOROKWEAR®)

SMI's own-brand workwear ranges, including ROKWEAR® and our sustainable sub-brand ECOROKWEAR®, are manufactured by a network of 14 factories located across China, India, Bangladesh, Italy, Turkey, and Pakistan. These trusted suppliers are integral to our value chain and support our commitment to quality, compliance, responsible production, and continuous environmental improvement.

ROKWEAR® products represented 35.01% of all products sold during the reporting period, based on unit volumes rather than revenue. ECOROKWEAR®, our sustainable product range incorporating recycled materials, enhanced product transparency, and lower-impact manufacturing practices, accounted for 0.62% of total units sold. While ECOROKWEAR® currently represents a smaller proportion of overall sales volumes, it continues to form an important part of our sustainability strategy and product development roadmap. Both brands are governed by the same robust supplier due diligence, ethical sourcing, and compliance framework, ensuring consistent standards across our product portfolio.

We undertake regular due diligence and ethical audits of the manufacturing sites of our own brand products under ROKWEAR® to identify, assess, and mitigate potential risks of modern slavery and human trafficking within our operations and supply chains. Our approach is informed by the International Bill of Human Rights and the labour standards established by the International Labour Organisation (ILO). Since our 2023 statement, we have further strengthened communication and awareness of ethical labour practices, environmental responsibilities, and human rights expectations across both our internal teams and supplier network.



# POLICIES, GOVERNANCE AND COMPLIANCE

SMI is committed to maintaining robust governance frameworks that support ethical business conduct, protect human rights, and help prevent modern slavery and labour exploitation throughout our operations and supply chains.

To reinforce these principles, we maintain a suite of policies that set clear expectations for our employees, suppliers, and business partners. During 2024, we reviewed and strengthened several key policies, including our Child Labour and Young Worker Policy and Migrant and Agency Worker Policy. These policies provide additional safeguards for vulnerable worker groups and support our commitment to identifying and mitigating modern slavery risks.

Alongside these targeted policies, SMI maintains a wider framework of policies and procedures designed to protect the rights, wellbeing, and dignity of all employees and workers connected to our business. These include:

- Supplier Code of Conduct
- Code of Business Conduct and Ethics
- Whistleblowing Policy
- Diversity, Equality and Inclusion Policy
- Equal Opportunities Policy
- Dignity at Work (Harassment and Bullying) Policy
- Grievance Policy and Procedure
- Anti-Fraud, Bribery and Corruption Policy
- GDPR Compliance Policy
- Health and Safety Policy

Together, these policies support a culture of transparency, accountability, fairness, and respect. They provide mechanisms for raising concerns, reporting unethical behaviour, and ensuring that potential human rights issues can be identified and addressed appropriately.



Our **Supplier Code of Conduct**, was updated in 2024, outlines the standards we expect all suppliers to uphold regarding human rights, ethical employment, safe working conditions, and responsible business practices.

The Code is grounded in internationally recognised frameworks, including ILO conventions, and requires suppliers to demonstrate commitments in the following areas:

## Child Labour Avoidance

- Suppliers must not employ children under the legal working age or below 15 years, whichever is higher.
- There must be robust verification processes to prevent child labour.
- Protection of young workers must include restrictions on night work, hazardous tasks, and overtime.

## Humane Treatment

- Suppliers must provide a workplace free from harassment, coercion, abuse, or threats.

## Freedom of Association

- Workers must have the right to freely associate, join trade unions, and bargain collectively in accordance with local laws.

## Wages and Benefits

- Employees must be paid at least the legal minimum wage, with all statutory benefits.
- Wage deductions as disciplinary measures are not permitted.

## Working Hours

- Working hours must not exceed the legal limits and should be consistent with international standards (e.g. ILO).

## Freely Chosen Employment

- Suppliers must ensure that all work is voluntary.
- Forced, bonded, indentured, or involuntary prison labour is prohibited.
- Workers must not be required to deposit identity documents or pay fees to obtain or keep their jobs.



**THE  
REASSURANCE  
NETWORK**

## OWN-BRAND THIRD PARTY ETHICAL & COMPLIANCE AUDITING

SMI has partnered with The Reassurance Network Group (TRN) for over five years to provide independent third-party support in assessing, monitoring and continuously improving the ethical, social and health & safety performance of our own-brand manufacturing partners. Responsible sourcing begins during our supplier onboarding process, which is managed by our Procurement Team. Before a manufacturing partner is approved, a comprehensive due diligence assessment is undertaken, including the collection and review of:

- Manufacturing site details and factory profiles.
- Business licences and relevant certifications.

- Environmental and quality management certifications, where applicable.
- Completion of SMI's Responsible & Sustainable Supplier Questionnaire.
- Review and acceptance of SMI's Supplier Code of Conduct, outlining our expectations on labour standards, ethical business practices, health & safety, environmental responsibility and legal compliance.

This initial due diligence enables SMI to assess supplier risk before production commences and ensures our expectations are clearly communicated from the outset.

TRN provides independent verification of supplier performance through comprehensive factory audits covering two key pillars:

- **Ethical Compliance:** Assessed against SMI's Supplier Code of Conduct, the ETI Base Code and internationally recognised labour standards.
- **Health & Safety:** Evaluating workplace conditions, management systems, employee welfare, fire and emergency preparedness, operational safety and legal compliance.

This is part of the onboarding process, and throughout the supplier relationship, Tier 1 own-brand manufacturing partners are independently assessed by The Reassurance Network Group (TRN) through a robust, risk-based audit programme.

The audit methodology includes detailed factory inspections, management interviews, document reviews and confidential worker interviews, providing an impartial assessment of working practices and helping to identify both compliance risks and opportunities for improvement.

Rather than relying solely on supplier self-assessments, SMI utilises independent third-party verification to provide objective assurance of supplier performance. This approach strengthens transparency across our supply chain and provides confidence to both SMI and our customers that responsible sourcing standards are being effectively monitored.

Audit findings are graded according to the severity of any non-conformities identified against SMI's Supplier Code of Conduct and the ETI Base Code. Where improvements are required, TRN works collaboratively with both SMI and the manufacturing partner to develop detailed, time-bound Corrective Action Plans (CAPs). Progress is monitored through documentary evidence reviews, follow-up assessments and re-audits where necessary until all actions have been satisfactorily closed.

SMI believes responsible sourcing extends beyond achieving compliance. We work in partnership with our manufacturing partners to build capability, share best practice and support continuous improvement across ethical, environmental and health & safety performance. Audit outcomes help inform supplier development plans, procurement decisions and future sourcing strategies.

Manufacturing partners are re-assessed on a regular basis, with audit frequency determined by supplier risk, previous audit performance, country of operation and the nature of any non-conformities identified. This risk-based approach enables SMI to focus greater oversight on higher-risk suppliers while maintaining ongoing monitoring across our own-brand supply chain.

By combining comprehensive supplier due diligence with independent third-party auditing and continuous supplier engagement, SMI demonstrates a proactive commitment to responsible sourcing, supply chain transparency and the protection of workers' rights throughout our own-brand manufacturing operations.

## NON-OWNED BRAND SUPPLIERS

Alongside our own-brand ranges, SMI works with a network of non-owned brand suppliers whose products form a significant part of our offering. These suppliers are subject to the same principles of ethical sourcing, supplier due diligence, and ESG oversight as our own-brand manufacturing partners.

As part of our supplier onboarding approval and ongoing monitoring process, suppliers are assessed through our Responsible Sustainable Partner Strategy (RSPS), Supplier Code of Conduct, and supporting policies, SMI aligns its approach with the UN Guiding Principles on Business and Human Rights (UNGPs), the Ethical Trading Initiative (ETI) Base Code, and 11 of the 17 United Nations Sustainable Development Goals (SDGs). This framework demonstrates our commitment to protecting internationally recognised human rights throughout our supply chain.

SMI works with a range of logistics, operational, and service providers that support the delivery of our products and day-to-day business activities. These include shipping and freight partners, transport providers, warehousing operations, facilities management companies, and cleaning service providers.

We recognise that sectors such as logistics, transportation, warehousing, and contracted services can present heightened risks relating to labour exploitation, vulnerable workers, excessive working hours, and unethical recruitment practices. As such, these suppliers form part of our broader responsible sourcing and due diligence programme.

Operational and service providers are expected to adhere to our ethical standards and demonstrate compliance with applicable labour, employment, and human rights legislation. Where appropriate, suppliers are required to acknowledge our Supplier Code of Conduct and provide evidence of policies, certifications, audits, or management systems that support responsible labour practices.

SMI maintains a zero-tolerance approach to modern slavery, forced labour, human trafficking, child labour, and any form of worker exploitation. Any concerns identified through supplier engagement, audits, or whistleblowing mechanisms are investigated and addressed through corrective action plans, with escalation procedures in place where necessary.

## TRAINING AND AWARENESS

SMI recognises that employee awareness is fundamental to identifying, preventing and addressing the risks of modern slavery within our operations and supply chain.

As part of our mandatory onboarding programme, all new employees are required to complete Modern Slavery Awareness training. This introduces our commitment to ethical business practices, explains the indicators of modern slavery and human trafficking, and provides employees with an understanding of how risks may arise within supply chains. The training also outlines individual responsibilities for recognising potential warning signs and escalating concerns appropriately.

To reinforce this knowledge, SMI's ESG Team delivers annual Modern Slavery Awareness training, which is available to all employees across every department and level of the business. These refresher sessions provide updates on emerging risks, legislation, industry best practice and SMI's responsible sourcing processes, ensuring employees remain informed and equipped to identify potential concerns.

All modern slavery training materials, guidance documents, policies and supporting resources are maintained within SMI's centralised training database, providing employees with continuous access to up-to-date information and reference materials throughout the year.

Employees are encouraged to remain vigilant and to report any concerns relating to suspected modern slavery, forced labour or human trafficking without fear of retaliation. Concerns can be raised through a number of established reporting channels, including line managers, the Human Resources team, the ESG Team or anonymously via SMI's Whistleblowing Policy.

In addition to internal training, SMI actively engages with its supply chain and wider stakeholder network to strengthen awareness and alignment on responsible business practices. In 2025, SMI delivered a supplier webinar to communicate its Responsible & Sustainable Partner Strategy, outlining our expectations for ethical conduct, human rights compliance and continuous improvement across the supply chain. The session also highlighted how this strategy links directly to SMI's wider decarbonisation roadmap and environmental objectives across the value chain, reinforcing the connection between ethical sourcing, environmental responsibility and long-term sustainability performance.

SMI also hosted an ESG networking event, bringing together suppliers, customers and key stakeholders to share best practice, discuss emerging sustainability challenges and strengthen collaboration across the value chain. This event provided a platform for open dialogue on ethical sourcing, modern slavery risks, environmental performance and shared decarbonisation goals, further reinforcing SMI's commitment to transparency and collective action.

These engagement activities ensure that both internal teams and external partners are clearly informed of SMI's expectations and are supported in embedding responsible and ethical practices throughout their operations. By embedding modern slavery awareness into both employee induction and ongoing development, and by extending training and engagement into our supplier and customer network, SMI seeks to foster a culture of accountability, transparency and ethical responsibility across all levels of our organisation and value chain.



# RESPONSIBLE SUSTAINABLE PARTNER STRATEGY (RSPS)

SMI's Responsible Sustainable Partner Strategy (RSPS) is an internally developed assessment framework used to evaluate the environmental, social, ethical, and governance performance of all business partners across our value chain.

The assessment is applied to key suppliers, manufacturers, logistics providers, service partners, and other relevant stakeholders, helping us identify risks, drive continuous improvement, and promote responsible business practices throughout our supply chain.

The RSPS provides a consistent and structured approach to supplier due diligence and partner engagement. It is designed to support our commitment to ethical sourcing, human rights, environmental stewardship, and transparent business conduct.

## SUPPLIERS ARE ASSESSED ACROSS THREE CORE PILLARS:

### Business Ethics

- Anti-bribery and corruption controls
- Ethical business conduct
- Supply chain transparency
- Data protection and governance
- Compliance management systems

### Respect and Uphold Human Rights

- Modern slavery prevention
- Child labour controls
- Forced labour safeguards
- Working hours compliance
- Wages and benefits
- Freedom of association
- Equality, diversity and inclusion
- Worker grievance mechanisms
- Health, safety and wellbeing



### Environmental Impact

- Environmental policies and management systems
- Carbon emissions measurement and reduction
- Energy consumption and renewable energy use
- Waste management and recycling
- Water stewardship
- Sustainable materials sourcing
- Biodiversity and conservation initiatives

## RSPS SCORECARD

Each assessment within our Responsible Sustainable Partner Strategy (RSPS) is scored on a scale of 0–5 and weighted according to its significance, generating an overall percentage score that determines the supplier's RSPS rating.

Any findings identified through assessments, audits, or supplier engagement activities are categorised as Critical, Major, or Minor. Suppliers are expected to implement corrective action plans within agreed timescales, with progress monitored through ongoing reviews and follow-up assessments.

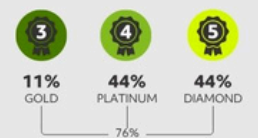
## THE RESPONSIBLE SUSTAINABLE PARTNER SCORECARD

TOP SUPPLIERS	Ethical Business Conduct & Human Rights	Occupational Health & Safety Standards	Energy Efficiency & Climate Action	Waste Reduction & Resource Management	Responsible Supply Chain Practices	Sustainable Product Design & Packaging	Community Engagement & Biodiversity Protection	ESG Score
RockFall	82%	90%	56%	27%	60%	65%	100%	69%
Ultimate	72%	72%	36%	55%	60%	60%	60%	62%
V12	78%	76%	64%	55%	60%	85%	100%	73%
JSP	98%	96%	86%	60%	60%	65%	100%	82%
LEO	88%	96%	80%	70%	100%	80%	100%	87%
Traffi.	96%	96%	77%	85%	80%	90%	60%	88%
REGATA	73%	84%	78%	85%	100%	85%	100%	80%
ROKWEAR.	73%	50%	45%	65%	47%	73%	38%	67%
ECO ROKWEAR.	95%	90%	90%	80%	35%	80%	100%	77%



### SUPPLY CHAIN MATRIX

Below is the score that supply chain achieved through SMI:



Date issued:

These suppliers were assessed in the last 24 months



# CONTINUOUS IMPROVEMENT AND FUTURE SUPPLIER EXPECTATIONS

SMI continues to strengthen its supplier due diligence and supply chain assurance through a combination of third-party due diligence assessments, independent supplier audits and our Responsible Sustainable Partner Strategy (RSPS). Alongside supplier guidance, training, webinars and ESG networking events delivered throughout 2025 and 2026, we are supporting suppliers to improve performance across human rights, labour standards, environmental management, governance, ethical business practices and responsible procurement.

By the end of 2026, SMI is committed to completing independent two-pillar responsible sourcing audits across all Tier 1 suppliers, delivered by the Reassurance Network Group. These audits assess compliance with our RSPS framework, including modern slavery and human trafficking prevention, labour rights, health and safety, environmental management, governance and supply chain transparency.

Where non-conformances are identified, we will work collaboratively with suppliers to implement corrective action plans, monitor progress and verify that improvements have been effectively embedded. Critical findings relating to modern slavery, forced labour, child labour, human trafficking or other serious human rights violations will be escalated immediately and may result in enhanced monitoring, follow-up audits, suspension of new business or termination of the commercial relationship where appropriate.

As part of our phased implementation, SMI is also introducing a number of non-negotiable RSPS requirements, which will be communicated during 2025 and 2026 before becoming mandatory from 2027. Through continuous supplier engagement, independent assurance and ongoing improvement, we are committed to building a transparent, resilient and ethical supply chain that protects human rights and helps prevent modern slavery throughout our value chain.

SMI recognises that preventing modern slavery and protecting human rights requires continuous vigilance, collaboration and improvement. While we are proud of the progress made during 2025 and 2026, we acknowledge that there is always more to do to strengthen transparency and raise standards across our operations and supply chain.

Through ongoing supplier engagement, robust due diligence, independent third-party assessments and audits, and the continued development of our Responsible Sustainable Partner Strategy, we remain committed to identifying, preventing and addressing the risks of modern slavery and human trafficking. By working in partnership with our employees, customers, suppliers and other stakeholders, we will continue to build a resilient, ethical and responsible supply chain that respects the rights and wellbeing of everyone involved.

This statement has been approved by the Board of Directors and demonstrates SMI's commitment to conducting business with integrity, transparency and respect for human rights, in accordance with the requirements of the Modern Slavery Act 2015.



---

[smigroupuk.com](http://smigroupuk.com) • [hello@smigroupuk.com](mailto:hello@smigroupuk.com) • 0330 441 3500



WORKWEAR



PPE



CLEANING &  
HYGIENE



WORKPLACE &  
FACILITIES



TOOLS &  
EQUIPMENT

Vision House,  
Bedford Road,  
Petersfield, Hampshire,  
GU32 3QB, United Kingdom