



MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

"We are committed to protecting the planet and its people."

ISSUE 3 • 2025



OUR COMMITMENT

SMI INT Group Limited (SMI) is fully committed to maintaining a business that operates with integrity and respect for human rights. We will continue to review and improve our policies and procedures to ensure that we meet our obligations under the Modern Slavery Act 2015.

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

Signed by:

Blake Prigrove
Chief Executive Officer



INTRODUCTION

This statement has been published in accordance with the Modern Slavery Act 2015, setting out the actions taken by SMI INT Group Limited and all entities during the period from 1 January 2024 to 31 December 2024.

Outlining the actions taken by SMI INT Group Limited ("SMI") and its regional entity, SMI Scotland (formerly LION, acquired and rebranded in January 2025 from LION to SMI Scotland).

We recognise that slavery and human trafficking are serious global issues that impact many sectors, and we are dedicated to addressing these challenges within our supply chain and workforce.

We have zero tolerance for slavery and human trafficking and are committed to ensuring that our practices and those of our suppliers comply with all relevant legislation. This policy applies to all employees, suppliers, and third parties involved in our business operations. As part of our commitment to conducting our business with the highest ethical standards, ensuring that human rights are respected, and safeguarding the well-being of individuals involved in our operations. We aim to ensure that slavery, human trafficking, and exploitation in any form have no place in our organisation or the businesses we work with.

Throughout this document, we refer to our business partners as a way of encompassing all partnerships within our supply chain and value chain. These include both upstream suppliers of all services and raw materials (including plastic and products mostly consisting of textiles), upstream logistics, and our downstream distributors and customers.

We are dedicated to conducting business in a way that respects the rights and dignity of individuals, and we continuously strive to maintain high standards of corporate social responsibility. This statement sets out the steps we have taken and will continue to take to combat modern slavery and human trafficking, in accordance with the requirements of the Modern Slavery Act 2015.

SMI is fully committed to ensuring that all our business activities are carried out in a transparent, ethical, and lawful manner, promoting fair treatment and working conditions for all involved.

OUR BUSINESS

SMI INT group Limited is a family-owned business founded in 1981 and based in the United Kingdom. Our headquarters is in Petersfield (Vision House), and our distribution centre (Kites Croft) and branding hub (Concorde Way) are in Fareham. With additional offices located in the northern regions of the UK.

SMI is a small-to-medium enterprise (SME) that specialises in sourcing and manufacturing premium PPE, workwear hygiene, and essential safety products. This includes our own brand, ROKWEAR, as well as collaborations with over 275+ UK suppliers, providing top-quality products to Britain's workforce.

We employ as of January 2024 225 people across our three sites and are governed by a team of six directors. For the financial year from January to December 2024, our group turnover was £40 million.

We serve over 1,200 clients across four key sectors: Waste & Environmental, Public Sector, Logistics, and Facilities Management, offering a range of 5,129 products across 50 product categories.

Our own-brand products, ROKWEAR®, launched in 2009, are designed and developed by our UK-based team and manufactured by our 12 supplier factories located in China, Bangladesh, India, Italy, and Pakistan. Once produced, these ROKWEAR® products are shipped to Southampton Port and then transported by road to our UK distribution centre (Kites Croft), which is located just 10 miles away.

At our branding centre located 1.6 miles from Kites Croft, we personalise the products upon the client's request, branding them with logos using our in-house embroidery or heat stamp process. The finished products are then distributed to our UK clients, with deliveries to customers in the Southeast made using our own van service, and the remaining deliveries handled by a third-party courier.

SMI IN NUMBERS

OPERATIONS:



1981
Founded



225+
Staff



£37.5M
Group Turnover



3
UK Offices



1
UK Warehouse



1
Branding Hub
Centre



12
Third-party
Suppliers



400
Third-party
factories
(total)

OUR ETHICAL SUPPLY CHAIN:

- Own brand production suppliers involved in the sourcing and manufacturing of our Rowear products. 12 active factories in our global own brand sourcing network.
- 5 new factories being onboarded in India, China, and Bangladesh as part of our dual-sourcing strategy
- 100% of Rokwear product range targeted for dual sourcing to reduce supply chain risk
- 10+ years of partnerships with trusted suppliers
- 2 pillar audits conducted annually, supported by third-party ethical auditors (TRN)
- 100% of new suppliers subject to due diligence and self-assessment screening
- 1 dedicated ESG department driving responsible sourcing and human rights compliance
- Zero tolerance for forced labour, modern slavery, or unethical recruitment practices

OUR SUPPLIER CATEGORIES

Own-Brand Production Suppliers (ROKWEAR®)

SMI's ROKWEAR®-branded products are manufactured by a network of 12 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, and responsible production. On average, ROKWEAR products account for 53% of our annual turnover.

Logistics & Operational Suppliers

We work with a range of partners who provide essential services such as shipping, transportation, warehousing, and facilities cleaning. In doing so, SMI actively supports job creation and contributes to the growth of local service economies connected to our operations.

We are also deeply committed to upholding human rights and apply the same zero-tolerance approach to modern slavery across our entire value chain, including these service-based partnerships. All suppliers are expected to align with our ethical standards and Responsible Sustainable Partner Strategy.

Non-Owned Brand Suppliers

In addition to our own-brand operations, we collaborate with suppliers involved in the sourcing and manufacture of non-owned branded products, which represent a significant portion of our offering. These relationships are managed with the same due diligence and ESG oversight applied across our supply chain.

COMMITTING TO COMBATING MODERN SLAVERY, THE VIOLATION OF HUMAN RIGHTS AND CORRUPTION WITHIN OUR VALUE CHAIN.

In line with the UN Guiding Principles on Business and Human Rights (UNGPs), the Ethical Trading Initiative Base Code, and 11 of the 17 Sustainable Development Goals (SDGs), SMI is dedicated to upholding internationally recognised human rights. This commitment is reflected in our RSPS and supporting documents, including the Supplier Code of Conduct, Code of Ethics, Child Labour and Young Worker Policy, and Migrant Agency Worker Policy.

Our approach is based on the International Bill of Human Rights and relevant labour standards from the International Labour Organisation (ILO).



DUE DILIGENCE AND RISK ASSESSMENT

We undertake regular due diligence to identify and assess potential risks of modern slavery and human trafficking within our operations and supply chains.

This includes:

- Conducting supplier audits and reviewing supplier practices to ensure they comply with our standards.
- Providing training to employees and suppliers to raise awareness of modern slavery risks and reporting mechanisms.
- Working with third-party audit specialists, The Reassurance Network Group TRN, to independently assess key areas of our supply chain and verify compliance with ethical labour standards.
- Conducting comprehensive self-assessments and ethical reviews of suppliers as part of our responsible sourcing programme.
- Performing regular supplier audits to monitor practices and ensure alignment with our values and code of conduct.
- Maintaining a robust recruitment process to ensure that no individual is subjected to forced labour or human trafficking.
- Delivering training to employees and suppliers to increase awareness of modern slavery risks and encourage the use of reporting mechanisms for concerns.



Commitment to Ethical Labour Practices

Our **Supplier Code of Conduct**, updated in 2024, outlines the standards we expect our suppliers to uphold in relation to human rights and safe, fair working conditions. It is grounded in internationally recognised frameworks, including the International Labour Organisation (ILO) conventions.

The Supplier Code of Conduct explicitly requires commitments to:

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.

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.

Working Hours

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

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.

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.

To reinforce these principles, we have additional policies that were reviewed in 2024, including a Child Labour and Young Worker Policy and a Migrant and Agency Worker Policy.

We also maintain a **suite of policies** protecting the rights and wellbeing of our own employees, such as:

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



In 2023, we transitioned from our Corporate Social Responsibility Policy to a broader ESG 2030 Strategy, supported by an annual ESG reporting framework and a dedicated Environmental Policy.

In 2024, we began developing:

- An internal manual for SMI employees to understand our supplier-related policies and procedures (including supplier onboarding, audit protocols, continuous improvement expectations, and responsible exit strategies).
- An external supplier manual to clearly communicate these requirements across our supply chain.

Strengthening Our Approach in 2025

In January 2025, we launched our RSPS Framework (Responsible Sustainable Partner Strategy), designed to further embed human rights due diligence into our supply chain practices. As part of this framework, we introduced our first Human Rights Impact Assessment Report, which assesses actual and potential human rights risks across key sourcing regions and categories.

This new framework enables us to:

- Prioritise risk-based supplier engagement and remediation.
- Increase transparency and accountability in our procurement processes.
- Drive continuous improvement and responsible sourcing practices across our global operations.



**SCAN TO
READ MORE**

OUR SUPPLIER CATEGORIES

In SMI's 2025 published Modern Slavery Statement, we renamed our Modern Slavery Statement to the Modern Slavery & Human Trafficking Statement to better reflect the full scope of risks we aim to address.

While the term modern slavery is commonly used, it can sometimes obscure the specific forms of abuse covered under UK law and international frameworks. By adopting the title Slavery & Human Trafficking, we align more clearly with the language and intent of the UK Modern Slavery Act 2015, which explicitly targets:

- Slavery
- Servitude
- Forced or compulsory labour
- Human trafficking for labour or sexual exploitation

This change reflects our growing focus on human rights due diligence, our newly introduced Responsible Sustainable Partner Strategy RSPS Framework, and our efforts to more transparently identify and address risks across complex supply chains.

Our supply chain

At SMI, we take a strategic and proactive approach to identifying and mitigating risks across our global value chain, particularly those that could impact the ethical flow of goods and services.

As part of our commitment to responsible sourcing, we are working to diversify our ROKWEAR® supply base, with a goal of 100% de-risking through dual sourcing from multiple countries. Currently, we partner with 12 factories to manufacture our ROKWEAR® brand, and as our business expands into new product categories, we are actively pursuing additional sourcing opportunities.

We are in the process of onboarding five new factories, including:

- A specialist garment supplier in India
- A glove manufacturer in China
- A hi-vis production partner in Bangladesh

In addition, approximately 72% of our annual spend is directed to our top 30 UK suppliers, all of whom undergo annual assessments aligned with our Responsible Sustainable Partner Strategy. This includes ESG-specific supplier self-assessments to ensure alignment with our values and expectations around ethical labour, environmental responsibility, and governance.

By fostering strong, long-term partnerships across our sourcing network, we continue to build a resilient, ethical, and future-ready supply chain.

Supplier Relationships

We work closely with our suppliers and expect them to adhere to the same high standards in preventing slavery and human trafficking. All new suppliers must complete our onboarding process, including the completion of a supplier questionnaire related to their compliance with modern slavery laws. Additionally, we review either (annually or bi-annually) supplier practices and contracts to ensure compliance with our policies.

Employee Training and Awareness

We provide regular training to all employees on the risks of modern slavery and human trafficking, ensuring that they understand the signs and know how to report concerns. Our employees are encouraged to report any concerns about suspected slavery or human trafficking through our established channels, including their line manager, HR, or anonymously through our whistleblowing procedure.

OVERVIEW OF OUR SUPPLY CHAIN

UK SUPPLIERS

This is an average score of our top 30 suppliers who have completed our self-assessment. 72% of our annual spend goes to our top 30 suppliers



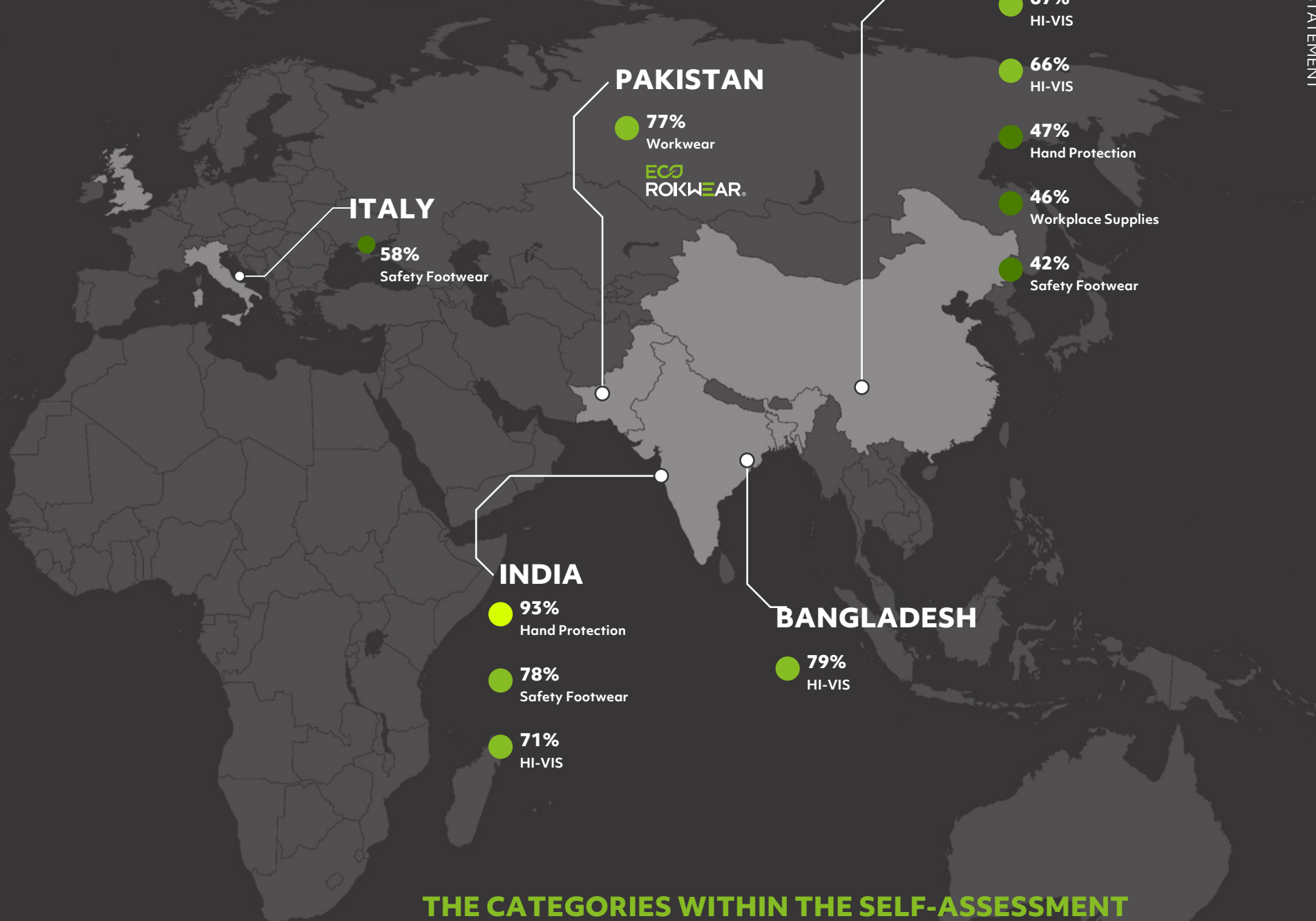
CALCULATING THE RSPS SCORE FOR EACH BUSINESS PARTNER

The scores are combined and the total score, then recorded as a percentage, is measured against our RSPS scoring matrix to determine the overall banding assigned to the business partner.



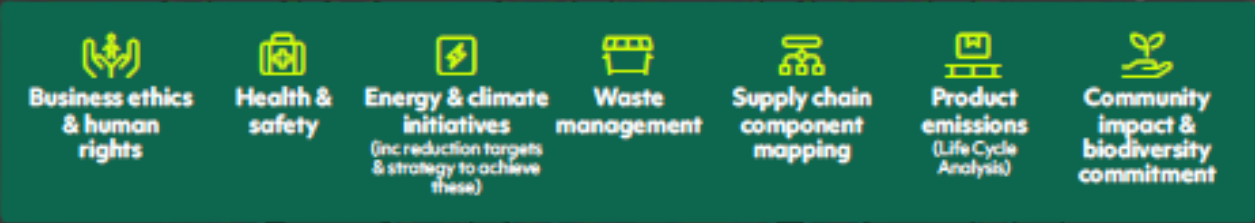
1 pts	2 pts	3 pts	4 pts	5 pts
No response to referenced question/requirement	Incomplete/incorrect response to referenced question/requirement	Response completed - details provided does not fulfil requirements	Response completed - details provided partially fulfils requirements	Response completed - details provided fulfils/exceeds requirements
0-25%	26-40%	41-65%	66-80%	81-100%
Supplier does not meet expectations	Supplier partially meets expectations	Supplier sufficiently meets expectations	Supplier wholly meets expectations	Supplier wholly meets and exceeds expectations

ROKWEAR®
12 OF SMI'S MANUFACTURING PARTNERS HAVE COMPLETED OUR SELF-ASSESSMENT



THE CATEGORIES WITHIN THE SELF-ASSESSMENT

Every question on the assessment has a maximum rating of five points, with each pillar having an assigned weighting based on the importance and scope of the pillar.





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