

Mathias Modern Slavery Statement 2023/24



Eurosafe
SECURING THE NATION'S PPE



Contents of the report

UNDERSTANDING

Introduction to Mathias

Organisational structure

Whistle blowing

Policies and governance

PROGRESSION

Assessing risks in our supply chain

Categorising our suppliers

Due diligence activities

Tracking our progress

STRATEGISE

Goals identified

Statement of approval

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human rights statement for the financial year ending 31st March 2024.

UNDERSTANDING:

Introduction To Mathias

Established in 1952 and still family owned and managed, Mathias provide corporate uniform, workwear and PPE to multiple sectors including utilities, construction, facilities management and logistics. Our current turnover is £7m and we employ approximately 50 staff at our Bristol headquarters. We voluntarily produce this annual statement as a pledge to our commitment to improve all aspects of our responsible social and environmental business practices.

We are part of the buying group called Eurosafe, a select group of independent organisations that are recognised as leaders in both health and safety and customer service, with a major market presence in their local regions. We have access to a variety of well known global brands and as a collective alliance of independent distributors we share and work towards the same set of ethical trading standards. We are a fully accredited, BSIF Registered Safe Supplier and members of the Supply Chain Sustainability School (Gold Status). As members of this group we have access to all of their modern slavery resources, online workshops and networking opportunities.

The purpose of this statement is to share with our stakeholders our achievements, challenges and progress. We take pride in our culture of transparency and for our direct and indirect employees to have involvement in the advancements of the business. This statement covers our supply chain, recruitment and behaviour of our colleagues, services we offer and our relationships with our suppliers and partners.

Highlights of 2023

We again gained a Silver Medal in the Ecovadis sustainability assessment. We are close to hitting the platinum score which puts us in the top 15% of companies. We hope to continually improve and gain Gold or platinum status in the future. To gain this we pay Ecovadis to assess our company across an environmental, social and ethical performance criteria.

How does an Ecovadis assessment help our sustainability performance?

- Clear and unbiased assessment using a methodology aligned with international standards
- Bench mark and compare our results with other companies in similar industries
- Support to track and improve over time using a quantitative metric system
- An additional resource for e-learning and best practice sharing

UNDERSTANDING:

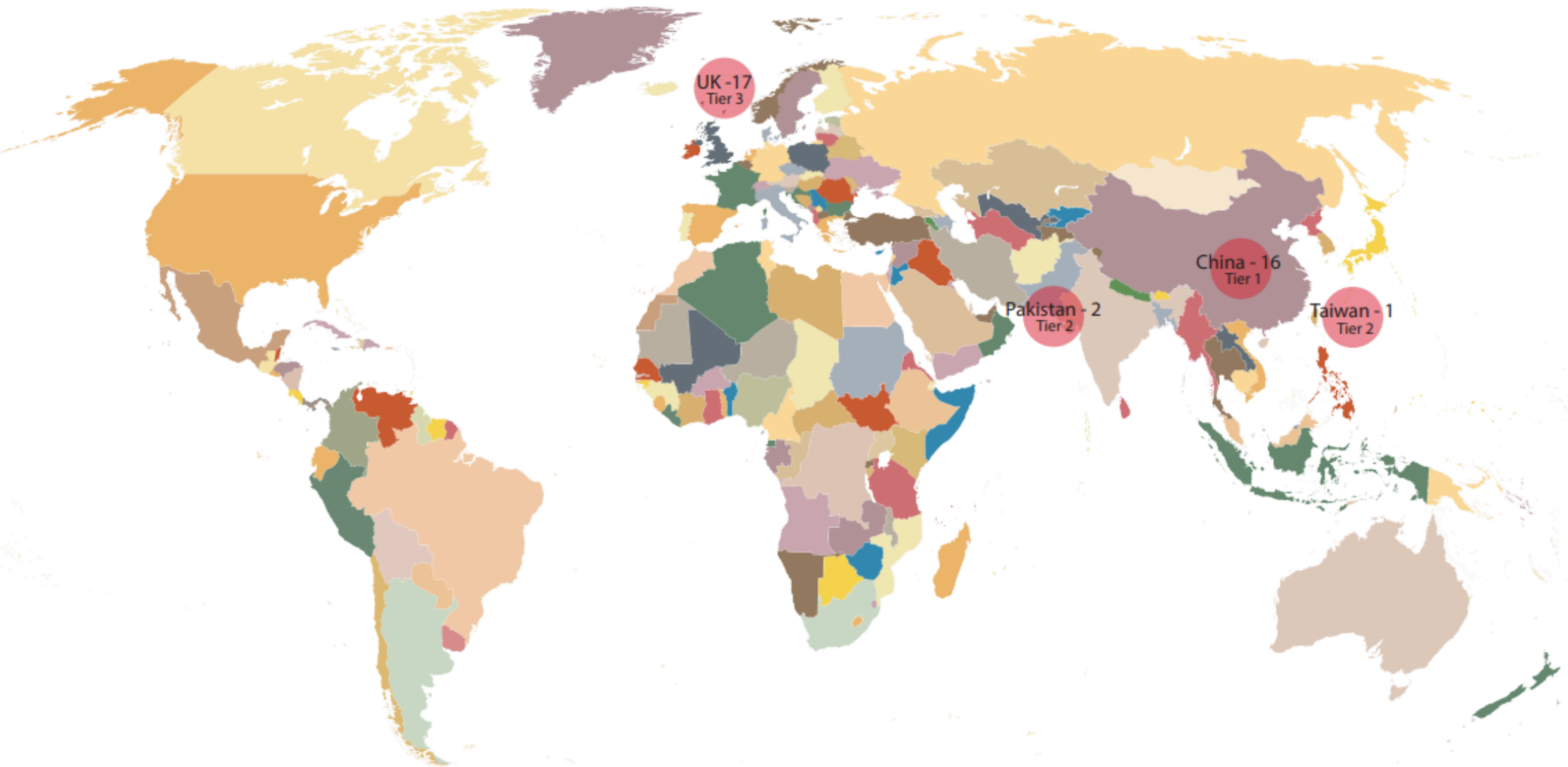
Organisational Structure

We have three types of supplier in our supply chain:

- UK based distributors of ready made items, mainly of clothing and PPE but we supply a wide range of items on a smaller scale- We refer to these as tier 3
- UK based distributors that allow us to order bespoke product or bulk orders for price savings from their offshore factories- We refer to these as tier 2
- Manufacturers based in other countries that we order bespoke product from and import it into the UK - We refer to these as tier 1

Further details on the assessment of these supplier groups can be found on page 8.

There have been no changes to our organizational structure in 2023. Please see below for the locations of these suppliers and the number of supplier in each location.



Supplier Group	Share of Spend
Tier 1 NON UK/EU Manufacturers	31.7%
Tier 2 UK/EU Suppliers manufacturing offshore	22.6%
Tier 3 UK/EU suppliers distributing ready made garments	45.8%

UNDERSTANDING: **Whistle Blowing**

Mathias encourage anyone (including employees, sub-contractors, suppliers and customers to report in good faith any issues or concerns about potential ethical, human rights, legal or regulatory violations, including improper or unethical business practices such as fraud or bribery.

All new employees based in our head office are made aware of our whistleblowing policy and the importance of reporting concerns. Concerns can be raised with line managers or directors. Details of an external helpline are included on the whistleblowing policy to use for help and guidance. We want all colleagues to feel confident and safe to use the resources we provide. In 2023 we added posters provided by the "Modern Slavery Is Closer Than You Think" UK government resources to commonly used areas such as the canteen.

We have not received any whistle blowing reports or indications from any other channels that there are potential modern slavery instances in 2023. We reached out to the internal managers to discuss if any failings or areas of weakness have been encountered this year & it was identified that there was some gaps in our recruitment processes that they felt it could be done better to avoid any risks. We really appreciated this feedback and used it to improve our recruitment procedures which can be found on page 8.

The modern slavery and exploitation helpline is part of leading anti-slavery charity "Unseen". They provide information, advice and guidance about any modern slavery issues.

You can:

- [Speak to an advisor about abuse, exploitation or modern slavery](#)
- [Get more information about training and raising awareness](#)
- [Report something you are concerned about](#)
- [Help you or someone else get access to support services](#)

In our sustainability training matrix we have included a compulsory training module on spotting the signs of modern slavery in the workplace. This is for all staff regardless of department or job role and is to be completed within 3 months of joining our company. Our training matrix allows us to specify which training each job role requires, within what time frame and how often we require a refresher course to be undertaken. Additional training specific to job role and department also is required.

Whistle blowing in our supply chain

Our supplier code of conduct covers the standards we expect our tier 3 network to adhere to. This agreement states that the supplier agrees to monitor their supply chain and can provide evidence of this if requested.

For tier 1 and tier 2 suppliers, whistle blowing is covered in the BSCI audits they provide. During the audit the auditor will check evidence that a Trade union representative has been allocated, meetings are held and also that there are anonymous methods of whistle blowing available such as suggestion boxes or helplines.

UNDERSTANDING:

Policies And Governance

We have continually gone above and beyond the minimum standards set out by law, in making our practices ethical and sustainable and we take any breach of our Modern Slavery Policy incredibly seriously. This document outlines our due diligence activities for the previous year, and any advancements or improvements we see need to be made for the following year. Our strategies are deeply rooted in the principles and guidance from sources such as Universal Declaration of Human Rights, Ethical Trading Initiative (ETI) base code and national and international trading laws.

As a small business we can easily update and retrain on policies and guidance which we have found has led to swift action where we identify we can improve procedures. We continually strive to increase the bar for best practice on all matters concerning sustainability including modern slavery.

Working with a 3rd party inspection company with offices based in China, we can ensure we are up to date and working to local trading laws with no language interference on documents or policies where we manufacturer some of our garments outside of the UK.

This statement is supported by our:

- Corporate Social Responsibility Policy
- Whistle Blowing Policy
- Environmental Policy
- Anti-bribery Policy
- Equal Opportunities Policy
- Ethical Trading Policy
- Modern Slavery Annual Statement
- Supplier Code of Conduct
- Modern Slavery Annual Statement
- Modern Slavery Policy

This Statement is available to all employees and is accessible on our website using the below web address. You can also access all of the referenced policies here;
www.mathiasandsons.com/about-us/policies

PROGRESSION:

Assessing Risks In Our Supply Chain

We have not added any suppliers outside of China in 2023, this would require us to carry out a new risk assessment due to geographic differences and location specific risks.

We were contacted by a factory offering competitive pricing in Myanmar but we declined in exploring this as an option due to it's documented history of repeated human rights offences. We know that investment into countries requiring a higher level of support can lead to advancement of the country, however we do not have the resources that would enable us to explore this safely. Changes in the global supply chains means there are many drivers for more competitive pricing outside of China, we are aware of the risks associated in sourcing new locations and may explore these in the future when we can ensure it will not affect our quality or sustainability standards.

Following an anlysatation of our supply chain we chose some key areas that our relevent to our business. We hope to use this information in 2023 to have specific methods of dealing with these risks.

Risk Area	Risk identifier	How we manage & mitigate risk
PPE manufacturing	The surge in PPE manufacturing during the pandemic highlighted human rights issues particularly in disposable gloves	We don't currently manufacture any gloves but we need to ensure we have transparency and support from the brands we buy from of their due diligence processes
Clothing manufacturing	Higher percentage of female work force- Women and girls account for 71% of all modern slavery & 58% of forced labour*	We conduct audits annually, and use an in depth remediation programme to support continual improvement. Our 3rd party inspection companies visit the factories for every order and are trained to spot risk identifiers of modern slavery.
Temporary warehouse staff	The use of agencies that insert a degree of separation between ourselves and the employee	Since conducting this risk assessment we have improved how we manage risk in regards to our direct employment which can be found on page 8. We also will be conducting an investigation in 2024 into the recruitment processes of agency staff for warehouse roles our UK distributors use.
Garments using cotton	Manufacturing in or near Xinjiang	We do not allow any cotton or any other production inputs to be sourced through subcontractors in or near Xinjiang. We also communicate a zero tolerance policy on forced or bonded labour with immediate suspension. We also monitor the recruitment agencies our Tier 1 fabric mills use which allows us to check if they are known for involvement with unethical practices.

*Taken from attached report <https://www.walkfree.org/reports/stacked-odds/>

PROGRESSION:

Best Practice Assessment

Work Stream	Best Practice	Do we already have this in place
Policy	Company ethical or human rights policy defining the ethical principles the company	
Policy	Company recruitment policy sets out the requirement to be aware of modern slavery in recruiting staff and that the company will not employ slaves	
Policy	Supplier code of conduct sets out slavery and labour standards to be upheld by direct suppliers and in the supply chain	
Policy	In all of the above there is a focus on proportional and targeted response to slavery risks that can be incorporated within an organisational approach to other issues such as labour standards, right to work, immigration etc.	
Leadership & Governance	The most senior management team in the company have recognised the need to address modern slavery and labour exploitation in the company's own operations and in its supply chain	
Leadership & Governance	Governance systems in place to monitor and prevent modern slavery and labour exploitation in the company's own operations/ supply chain	
Leadership & Governance	Whistleblowing process gives guidance on reporting suspected instances of modern slavery and how to respond	
Leadership & Governance	Reviews of controls by a third party	

Best Practice Assessment

Work Stream	Best Practice	Do we already have this in place
People	All staff are aware of the existence of modern slavery & the company's policy in relation to it	
People	Staff responsible for the recruitment of low pay workers are trained in how to recognise modern slavery and what to do if they suspect it's presence	
People	Staff who work with subcontractor and agency workers are trained in how to recognise modern slavery and what to do if they suspect it's presence	
People	Recruitment process includes Right to work checks. Payroll checks identify highly populated addresses and multiple payments to the same account	
Risk and Opportunity Assessment	Analysis of where the greatest likelihood of slavery is within the company's operations, it's supply chain and subcontractors	
Risk and Opportunity Assessment	Maintenance of an ethical risk log that is regularly reviewed	
Risk and Opportunity Assessment	Organisation participates in a supply chain mapping process	

Direct recruitment

We are very aware that modern slavery exists in the UK, and as a business that hires temporary and agency staff we understand our responsibility in ensuring all legal channels and due diligence is carried out when hiring new staff and also whilst anyone is employed by us.

We have an internal recruitment process that includes due diligence checks for the new employees documentation.

2023 Updates: We identified we had a training gap in written training guidance for the members of staff involved in recruitment and the administration associated with recruitment. We have historically used a 3rd party Human Resource company for any employment advice, this contact information is also now documented for easy access if needed.

We created the following to help support our staff in understanding risk assessment and procedures in relation to modern slavery;

- Recruitment procedures training guidance
- Recruitment and selection policy
- Conducting training sessions for “Right to work checks (Employer Guidance)” and “5 Ways Technology Can Help Your Right To Work Checks” supplied by the Supply Chain Sustainability School

We also created an agency checklist for HR to follow, which includes;

- To send any new agency our ethical trading policy
- They agree and sign their acknowledgement of our recruitment code of conduct
- They send us their modern slavery due diligence policy/procedures

For 2023 we are keen to expand on investigating further into how we can improve on this. In March 2023 our commercial director Adam Lane attended a "Best practice in combatting modern slavery in business" event organised by the Supply Chain Sustainability School. After attending this meeting he was keen to lead and support providing our head office staff with training and due diligence methods that has been discussed by other companies.

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PROGRESSION:

Categorising Our Suppliers

In 2023 we documented the tiers for our suppliers. By categorising our suppliers into 3 tiers using a risk assessment process, we are able to use 3 different methods of reporting and investigation. We no longer refer to these categories as High to Low risk, as this can imply that the likelihood of practices of modern slavery for example are not possible in a "low risk" environment and through further investigation we see that this is indeed very possible, even in the UK. Instead we offer different levels of support and investigation methods to suit the tier assigned. We have always had a method of categorising our suppliers into 3 tiers however we had not documented it so we could share it with others.



Tier 1 Suppliers

These suppliers have been identified as requiring a higher level of support.

Qualifier : Direct to factory relationship ordering Mathias branded plain or customer logoed products

1. SMETA or BSCI Audits submitted annually
2. Corrective Action Plan support in between audits
3. A 3rd Party Inspection company visits the factory for every order to conduct quality inspection



Tier 2 Suppliers

These suppliers have been identified as requiring a medium level of support as they already conduct their own responsible business practices we can review.

Qualifier : UK based distributors importing customer logoed products from outside of the UK.

1. SMETA or BSCI Audits submitted every 3 years
2. Mathias Code of Conduct Evaluation Completed every 3 years



Tier 3 Suppliers

These suppliers have been identified as requiring a lower level of support as they already conduct their own responsible business practices we can review.

Qualifier : UK based distributors selling plain garments

1. Ethical trading audits that follows the ETI base code or similar submitted every 3 years
2. Mathias Code of Conduct Evaluation Completed every 3 years

PROGRESSION:

Due Diligence Activities

We have found no instances of modern slavery or reports of modern slavery in the past year. We continue to implement our process for mandatory due diligence checks on new suppliers and we will continue to refine our assessment of modern day slavery risks in 2024.

We have continued to focus on clear communication with our offshore factories through their corrective action plans which are built from the factory audit. We communicate through the year on the non-compliances identified and support on identifying the root cause or a plan to close the NC.

We started to investigate further into the hiring of Uyghur Muslims to identify if there was any unlawful/ unethical treatment in our supply chains. We have learnt that this is a very complex issue, we will continue to increase our knowledge and understanding on how to ensure we track indicators of human rights violations to Uyghur Muslims or any other vulnerable groups. We understand that migrant workers also should have free movement and lawful employment and do not want to discriminate against any migrant workers including Uyghur Muslims in our efforts to identify where there is a risk of bonded labour.

A UK based supplier received our routine Supplier Code of Conduct form and informed us that they could not renew their agreement to it as the law had changed regarding some of the clauses in the agreement. We felt that although no longer needed due to legal requirements we did not want to remove the clauses as they are still in line with what we feel our supply chain should endeavour to achieve. Because of this we told the supplier we would have to suspend ordering items from them until this is resolved, in 2024 we hope to share training on these items which will help them to go further than their legal requirements.

Updates for 2023: We have added our data analyst to the ethical trading team, they have a strong passion for helping us to improve our monitoring and data collection and felt they could add an additional layer of skills to the group.

We have identified that tier 3 suppliers based in China have non-compliances around working hours being exceeded.

"In line with the UN Guiding Principles on business and human rights or UNGP's - business enterprises should establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted. Where business enterprises identify that they have caused or contributed to adverse impacts, they should provide for or cooperate in their remediation through legitimate processes."

We understand that we do have a responsibility to the factory to ensure we are not contributing to production scheduling issues by "chasing" the factory to finish orders sooner than their recommended completion date even if we are under pressure from our customers. We forecast our orders through the year to ease urgent orders which can add strain to their resources and build in peak seasons delays into our lead times. We have created a working hours reporting system to help us monitor and track the suppliers over time to show that we take this matter very seriously and we are committed to seeing an improvement although we know this will take time. Every month our tier 3 factories submit their working hours and overtime data and we discuss how they are managing their production schedules. We also regularly monitor that the overtime is voluntary by checking an active trade union agreement is in place and the voluntary overtime pay agreement which is legally advised at 125% is being paid.

PROGRESSION:

Tracking Our Progress

Goals identified in 2021 for managing risks of modern slavery in our organisation and the current status for those goals. These can be seen in our previous Modern Slavery statement for 2021.

Previous goal or additional progression we've made	Update
Increase resources to allow additional monitoring of the corrective action plans and further support the factories with more communication	We have included a data analyst to dedicate time supporting the ethical trading team. This will be extremely valuable in collecting and reviewing data we currently already hold or log.
Create a training matrix which specifies the level of modern slavery training required for all employees and investigate how we can better support our suppliers to increase their training	The training matrix template is completed. We need to continue to work on what training will be given to which job roles and what training will be shared with our suppliers.
100% of staff who have been in the business longer than 3 months have received training on hot to spot modern slavery in the business.	New questionnaire to be done in 2024 to asses improvements in training. We provided additional training across the business to achieve this goal and also created a training matrix to make it easy for management to track this.
Create a supply chain map	Completed. We currently can send this to customers on request but we would like to update it onto our MUMS system which would allow us to include personalised information specific to the garments the customer buys. We will continue to develop this in 2024.
Extended out our Supply Chain Sustainability School resources to our offshore purchasing executive and offshore data analysis	In 2023 we added more user log ins to our membership so that additional employees who we feel would benefit can access the training resources and also contribute to our overall company targets. Management also encouraged staff to explore the website and utilise the resources on there.

Previous goal or additional progression we've made	Update
Creating a working hours reporting system for our tier 1 factories	We had inconsistent data for this until November 2022, with closures for Chinese New Year in February this means we still do not have consistent data to work off of. We will continue to work on this going forward.
We had a UK agent supplier that was using a factory in Pakistan to produce small custom orders for us. We paid for a private audit by our Inspection company but this was not a BSCI or SMETA audit, we had been discussing with them for many years and used other suppliers because they did not want to pay the high cost for an audit.	In 2023 this supplier did a BSCI audit and the results were very good. We do believe that we contributed to guiding the supplier
We started to discuss our wider supply chain which includes our service providers can also be monitored	So far we have started to send out our supplier code of conduct forms to our service providers. In 2024 we would like to continue with our risk assessment and potentially including them within our tiered system
In our investigation into modern slavery in our supply chain through the unethical treatment of Uyghur Muslims, we extended our communication to the recruitment agencies our Tier 1 factories use	We verified that our Tier 3 factories either do not subcontract our their recruitment to another company or that the recruitment agency had not been found to be connected to unethical practices. We also checked the percentage of migrant workers on the audits as a key identifier of a risk of Uyghur Muslims in the factory.
Become Members of SEDEX	In order to streamline our method of recording our audits and sharing with our customers, we have taken the decision to become members of SEDEX. By the end of 2024, we hope to have all our supplier audits within SEDEX

Our Goals For 2023/24

For 2023/24 we aim to build on and increase our current methods of reporting and analysis. We have built a very good foundation which we expect can now be expanded further.

01

Build an ethical trading KPI system which includes targets

We would aim to create a set of KPI's for our tier 3 suppliers to enable us to track their performance. This will be useful to share with customers and the suppliers themselves.

03

Review tier 3 risk analysis and systems in place

Review Tier 3 - (UK based distributors) to ensure our current procedures and methods of monitoring are sufficient. We also want to investigate further the "hidden" risk areas such as UK freight companies and warehousing subcontractors we may be using. We currently do not include service providers in our tier system but have treated them as tier 3 suppliers. We believe due to the varied nature of the services, a risk analysis is appropriate.

02

Create more company resources and training access across the business

For the last few years we have focused so much on creating, adapting and monitoring that we do not share internally and externally all of the progress and efforts we make in ethical trading. By creating more easy to access resources our account managers can comfortably discuss these topics with customers. We also feel now we have a Modern slavery training matrix we can extend training further across our employees.

04

Become members of SEDEX

In order to streamline the process of recording and updating our ethical audits, Mathias have joined SEDEX. BY the end of the year we hope to have 90% supply chain uploaded to SEDEX.

Statement Of Approval

This statement has had the appropriate support and approval from the Board of Directors.

This Modern Slavery Statement will be regularly reviewed and updated at least annually. The Board of Directors endorse this policy statement and is fully committed to its implementation.



A handwritten signature in black ink, appearing to read 'J Mathias', written over a horizontal line.

Jason Mathias
Managing Director



A handwritten signature in black ink, appearing to read 'Adam Lane', written over a horizontal line.

Adam Lane
Commercial Director