

## **Modern Slavery Policy**

### **Introduction**

The Modern Slavery Act (MSA) was introduced by the UK government in 2015, this legislation was implemented to ensure that slavery, servitude, forced or compulsory labor and human trafficking do not occur within UK businesses.

Modern Slavery is a criminal activity and a violation of human rights. The deprivation of a person's liberty by another to exploit them for personal or financial gain is unacceptable. For these reasons, slavery and human trafficking is a matter of zero tolerance at Browns More Hair Now Ltd.

At Browns we acknowledge our responsibility to prevent modern slavery and human trafficking throughout our business and supply chain. As a UK market leader within the wig market, we recognise we need ensure everyone who works for us or who produces goods under the Browns brand is treated well and chose said employment freely.

### **Business Overview**

Browns More Hair Now Ltd is proud to be Britain's longest established, independent wigmaker with over 100 years knowledge and understanding in making and fitting of wigs.

We provide our wig service to private and NHS clients throughout the United Kingdom which includes England, Scotland, Northern Ireland and Gibraltar.

It is our approach to comply with all laws and regulations relevant to our business and in all countries where we may operate. Following the implementation of the Modern Slavery Act 2015, Browns More Hair Now Ltd is committed to implementing and maintaining effective systems to ensure modern slavery is not taking place anywhere within our business or supply chain.

### **Policies**

Our Policy is to source and purchase goods which are produced and delivered under conditions that do not involve the abuse or exploitation of any persons; encompassing the following aspects: Child/Forced Labour, Conditions of Work, Health and Safety, Discrimination, Wages, Hours of Work and Environment.

All staff involved in the engagement of suppliers must communicate our zero-tolerance approach at the outset of a business relationship and monitor their compliance with our Policy as appropriate thereafter. We may terminate our relationship with third parties engaged with us if non-compliance with this Policy is found.

In addition to this Policy, we operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner, and these include a robust

Registered Office: 12, Atlas House, West Devon Business Park, Tavistock, PL19 9DP  
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Website: [www.morehairnow.com](http://www.morehairnow.com)

recruitment policy including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Therefore, to ensure compliance with Sections 15 to 25 of the Immigration and Asylum & Nationality Act 2006, we have in place, several requirements.

These are the responsibility of our Senior Management team to govern, oversee and manage on a day-to-day basis. This ensures Browns More Now Ltd are compliant, with these requirements, both with our Browns employees and supply chain partners.

**Requirements:**

1. Ensure that our associated approach in relation to procurement (including Sub-Contractors, Agency and Self-Employed personnel), and recruitment, reflects the commitment to identifying and eliminating modern slavery and the employment or engagement of illegal foreign workers.
2. Reviewing on a periodic basis, including for all agency, self-employed and sub-contracted personnel, the management processes, to ensure they reflect our commitment.
3. Undertake risk assessments of Browns More Hair Now Ltd.'s supply chain partners when they are becoming a partner.
4. Undertake a right to work check on new employees that encompasses human rights and modern slavery and the right to work in the U.K.
5. Validate and periodically confirm that our supply chain partners also undertake a right to work check on their new employees/contractors.

Internally, this Policy applies to all directors, shareholders, employees. Any reported breach of this Policy will be investigated and may lead to disciplinary action as appropriate and in line with Company disciplinary procedures.

Externally, this policy also applies to all agency, self-employed and sub-contracted personnel. For both internal and external personnel, we ensure compliance with the Home Office Guidance for Employers (as per the link below), on preventing illegal foreign workers, in accordance with these guidelines.

<https://www.gov.uk/government/publications/right-to-work-checks-employers-guide>

Any documentation that is used to verify right to work checks, are retained during the period of any employment or engagement, and for a period of 2 years after they have left.

Training on this Policy and on the risk our business faces from modern slavery in its supply chains forms part of the induction process for all individuals who work for us and additional training will be provided as necessary.

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The detection and reporting of Modern Slavery is the responsibility of all of us. Concerns raised about any issue or suspicion of Modern Slavery should be reported through our established communication channels or confidentially by following the Company Whistle Blowing Policy which can be found in the Company Handbook.

Shirley Tubridy  
**Head of Operations, NHS New Business and Contracts**

Date: November 2024

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