



Toymaster Ltd
Victoria House
Newport Pagnell Road West
Northampton
NN4 7JJ

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Tel: (01604) 674477

E-mail: admin@toymaster.co.uk

Modern Slavery Disclosure Statement

Modern slavery is a crime resulting in an abhorrent abuse of human rights. The Modern Slavery Act 2015 is intended to address the offences of slavery, servitude and forced or compulsory labour and human trafficking.

For the purposes of this statement modern slavery relates to:

- **Slavery** - the status or condition of a person over whom any or all the powers attaching to the right of ownership are exercised
- **Forced Labour**- employed against a persons will
- **Human Trafficking** - where a person arranges or facilitates the travel of another person with a view to them being exploited.

Toymaster Ltd organisation structure and supply chain

Toymaster Ltd is a buying group for independent toy retailers. Toymaster Ltd has a central office in Northampton in the UK where 17 people are employed. Centrally negotiating trading terms, processing invoices, payments and helping in marketing activity which more than 250 independently owned and operated toy shops in the United Kingdom and Republic of Ireland can benefit from.

Members of the group purchase from approximately 200 Suppliers with an annual turnover of circa £50 million. Toymaster Ltd do not have any own label products, toys are purchased direct from UK/EU Suppliers. Toymaster Ltd also import direct from Suppliers from the Far East, a contract warehouse service in Southampton is used for this service.

Toymaster Ltd Suppliers source the products from around the world.

Company policies that relate to Modern Slavery

Toymaster Ltd have a Modern Slavery policy, which has been put into place this year. In addition, for UK operations there are HR policies controlling the documents requested during employment of staff.

Risk Assessment

The structure of Toymaster Ltd supply chain is very simple and the size of the operation small. The risk of modern slavery should be limited to our service companies such as cleaners and warehousing.

Toymaster Ltd employment policies should adequately prevent employment and anyone involved in or affected by modern slavery.

In addition, Toymaster Ltd provide a service to over 250 independently owned shops and it is possible that service companies to these shops may expose our supply chain to modern slavery.

Finally, Toymaster Ltd Suppliers will be dealing with factories from around the world but primarily in China. This area is perhaps our most exposed part of the supply chain and one Toymaster Ltd has limited influence over.

Processes that relate to Modern Slavery

Action taken to date

The requirement to comply with the Modern Slavery Act is relatively new to Toymaster Ltd and therefore some limited steps have been taken so far.

1. Statements regarding compliance with the requirements of the Modern Slavery act have been added to all purchase order documents since October 2016. Some of these documents have signed confirmation of compliance by Suppliers.

2. A standard letter explaining Toymaster Ltd need to comply with the Modern Slavery Act has been drafted. This letter will be used with Suppliers and Members in due course.

3. A declaration of conformity about the Modern Slavery Act has been drafted and has been used to confirm compliance with the act by UK warehousing and cleaning companies.

Actions planned during 2017

4. Ethical audits at factories - As a member of the British Toy and Hobby Association Toymaster Ltd must ask its Suppliers to use factories that are audited under the ICTI Care ethical audit process or a similar scheme with the same or better standards.

This has always been implied but not formally agreed with Suppliers. In October 2017, this requirement will be added to purchase paperwork. As an ethical audit can manage many aspects of the Modern Slavery Act, further steps will be taken to establish the audit status of our Supplier's factories. However, it should be noted that the influence Toymaster Ltd can exert over those factories may be very small and we would be reliant on the support of our Suppliers in this instance.

5. Information – the standard letter explaining the act and the obligations Toymaster Ltd must meet will be sent to suppliers and our Members. This will be reinforced by promoting this letter on the Toymaster Ltd website.

Actions planned for 2018

6. Suppliers – a more detailed risk assessment of our suppliers investigating those with Modern Slavery obligations of their own (i.e. over £36m turnover) and those that may present a higher risk. A supplier action plan will then be set.

7. Suppliers – further steps to establish the ethical audit status of their factories, this could include a questionnaire.

Effectiveness of actions

Toymaster Ltd will remain very dependent on the actions of others to ensure compliance. However, we are confident that our policy of long term relationships with Suppliers and Members will help in this work.

Training and capacity building

Toymaster Ltd does not envisage training with our UK staff as this is not seen as the best use of this resource. More emphasis will be placed on informing Suppliers and our Members so that they can take appropriate action in the highest risk areas.