

Modern Slavery and Human Trafficking Statement

Background

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 (MSA) and is published on behalf of the Totally Wicked Group Limited ('Totally Wicked') comprising Totally Wicked Bidco Limited, Pillbox38 (UK) Ltd, UK Vapour Brands Limited and The Electronic Cigarette Company Ltd. It constitutes our slavery and human trafficking statement for the financial year ending March 2019.

Totally Wicked is the UK's premier vaping wholesaler and distributor of e-cigarette kits and e-liquids, as well as manufacturing our own range of e-liquids in the UK. Our products are sold direct to the public through our owned retail stores, via our websites and through our change of dedicated and independent retail stores. Our company employs over 350 employees who ensure that all our operations work effectively together to achieve our goals.

Our Effectiveness in combatting Slavery and Human Trafficking

As an organisation we are committed to acting ethically and with integrity in all our business relationships. We are committed to complying with the MSA and improving our practices to combat slavery and human trafficking.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common a deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We take a zero-tolerance approach to such slavery and human trafficking in or around our organisation. We comply with all the applicable employment legislation relating to the employee terms and conditions and have the following internal policies to ensure that we conduct business in an ethical and transparent manner:

- Recruitment – Totally Wicked conducts employment checks on new employees including eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing Policy – Totally Wicked has a whistleblowing policy so that employees can raise any concerns they may have without fear of reprisals.

We continue to focus on raising internal awareness to enable the relevant members of our business to understand the requirements of the Modern Slavery Act and to give them the tools to flag potential issues.

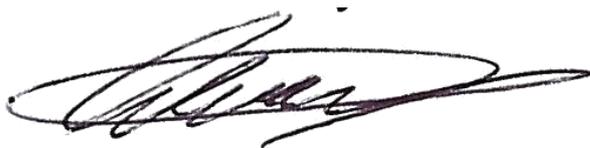
Our Supply Chains

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Totally Wicked is committed to the highest standards of professionalism, ethical behaviour and integrity in everything we do. In this we are committed to opposing modern slavery in all its forms, and do not tolerate it either with our business itself or within our supply chain.

We expect our suppliers, and tier supply chains, to take all reasonable and practicable steps to comply with the MSA, to engage in good employment practices and to comply with all relevant legislation and regulations.

As an organisation, we consider the risk of modern slavery occurring within our business and its supply chains to be low. Totally Wicked has developed a risk-based approach to assess the likelihood of the existence of Modern Slavery without our supply chain. The criteria used for this approach includes factors such as the origin of manufacture and the nature of, and locations from which services are provided.

This statement is authorised and approved by FRASER CROPPER, a director of the Totally Wicked Group Limited.



Director, for and on behalf of: **TOTALLY WICKED GROUP LIMITED**

26th March 2019