Modern Slavery Statement

For financial year ending 31 December 2025

This statement is made on behalf of Flashbay Electronics Europe Limited, Flashbay Limited and their affiliated undertakings, in particular Flashbay Electronics Huizhou Limited and Flashbay Electronics Shenzhen Co Limited, pursuant to section 54(1) of the UK Modern Slavery Act 2015 (MSA) and equivalent Irish legislation, principally the Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013 and by the Criminal Law (Sexual Offences and Human Trafficking) Act 2024.

Our Organisation

Flashbay is the world's no. 1 business-to-business (B2B) supplier of on-demand logo branded promotional technology products. Founded in 2003, the Flashbay brand has over 800 employees worldwide spread across 5 international offices, with Flashbay Electronics Europe Limited and Flashbay Limited having operations in London bringing them within scope of the Modern Slavery Act 2015.

Commitment

It is a priority for Flashbay to ensure that no part of our business is involved in slavery, forced or compulsory human labour, human trafficking or abuse of power in any shape and form. We strive to uphold human rights of all our employees, workers in our supply chains and others affected by our business activity in the UK and beyond.

Our Flashbay Factory, based in Shenzhen in China is committed to ensuring that working conditions in both the factory and our supply chain are safe, that workers are treated with respect and dignity and that manufacturing processes are environmentally responsible.

Supplier Code of Conduct

The majority of our suppliers are companies providing us with materials, parts, equipment or services to our Flashbay Factory. Our Supplier Code of Conduct must be adhered to by every supplier, vendor, consultant and contractor working on behalf of Flashbay. It sets out our core values and expectations on a range of issues, including the need to promote and respect human rights by preventing child and/or forced labour and human trafficking. Our first-tier suppliers are required to confirm that they implement our Code whilst working for us and we also make sure that the rest of our factory suppliers operate in accordance with similar rules and regulations.

Due Diligence

We expect all our contractors, suppliers and other business partners to uphold the same high standards as we do. We take the management of our supply chain seriously and we work only with reputable providers. To ensure that they comply with our values, we continue to carry extensive due diligence to identify and monitor potential risk areas in our supply chains. We always consider various factors to tailor suit our due diligence checks depending on the risk identified.

Our Policies

We have implemented internal policies as part of our commitment to ethical business practices. We have Human Rights Policy comprising anti-harassment clauses and mechanisms to enable concerns to be raised and resolved. We encourage all our staff, clients and other parties to report any concerns they may have in relation to a risk, malpractice or wrongdoing that affects others such as clients, staff, the firm, suppliers or the public. Our whistleblowing procedure is designed to ensure that people can make disclosures without fear of retaliation.

Looking Ahead

Following the review of our current policies, we will strive to maintain practices and policies already in place but also develop new initiatives to tackle any threats of slavery or human trafficking in our organisation and our supply chain. We understand that it must be a continuing effort requiring periodical review and reassessment in light of changing global circumstances.

This Transparency Statement, pursuant to section 54 of the Modern Slavery Act 2015, covers the Flashbay financial year ending December 2025, has been approved by the board of Directors and will continue to be updated annually.

On behalf of Flashbay Ltd and Flashbay Electronics Europe Ltd,

Stephen Webster
Director & CEO
Flashbay Limited & Flashbay Electronics Europe Limited