

Modern Slavery Statement: 2020



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Modern Slavery 2020

Introduction

We are principally a provider of retail solutions, products and services to a wide range of retailers and brands. The Group has an annual turnover in excess of £100m, and employs over 3600 people across the group. This statement covers our Group which is headed by Retail Solutions (Holdings) Ltd and includes: Dee Set Confectionery, Dee Set Logistics, Tactical Solutions and White Hinge

We are committed to improving our practices to combat slavery and human trafficking. We recognise that forced labour and human trafficking for labour exploitation is often well hidden by the perpetrators with victims reluctant to come forward. Dee Set are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our business

Product Services

- Retail merchandising
- Distribution
- Fulfilment
- Creative
- Print services
- IT / Data solutions



Greg Phillips
Chief Executive Officer

This statement was approved by the board of Dee Set

Our Business

3,600+

Colleagues working
across the group.



1,600,000+

Hours a week per year
spent in stores
merchandising across the
group.



2

other business form part of
the Dee Set group.

250,000+

Units picked per week in
our warehouse.



Our partners

MHR being our partners using the HR iTrent systems.

eArcu partnership in recruiting the right people.

Partnering with Predictive Hire means we are recruiting the best talent!

Thrive Partnerships gives us the best e-learning platform for mandatory and shared learning

Blink is our two way daily communication with our colleagues in the field and in support offices.

 MHR eArcu predictivehire.
find better people faster THRIVE blink

Product Supply

Summary

We act as an intermediary for the consolidation and distribution of products into three major retailers; Asda, Morrison's and Wilkos. This accounts for 202 of our suppliers, and approximately 87.4% of our spend with suppliers. We source a number of our own products for supply into retailers, directly from China, which are classed as “Dee Set imported” items.

Consolidated Supply Chain

- Our top 10 suppliers account for approximately 49% of the supplier spend.
- All supply chain colleagues have completed the reviewed online learning of Modern Slavery.
- In 2020 we had planned to assess top 10 suppliers, but after engagement with retail partners, it was seen that this was not a requirement of the current service through the consolidation model.

Product Supply

Import Supply Chain (Far East)

- Currently we use 3 suppliers in Far East, on-Time General Union & A&R Marketing
- In 2020 “On-Time” accounted for 80% of “Dee Set imported” products. This factory works in line with ETI base code and are also Sedex audited.
- In 2020, we had planned to create a new Dee Set supply charter which suppliers would be required to sign up to. Due to COVID and supply challenges we have been unable to complete in 2020, but plan to have this implemented in HY2 2021 and forms part of the 2021 action planning

- Employment is freely chosen.
- Freedom of association and the right to collective bargaining are respected.
- Working conditions are safe and hygienic.
- Child labour shall not be used.
- Living wages are paid.
- Working hours are not excessive.
- No discrimination is practiced.
- Regular employment is provided.
- No harsh or inhumane treatment is allowed.

Labour Providers

Agencies

We have identified that the use of agencies is a relatively high risk area and have analysed the agencies we have used to supplement our own labour pool. We have taken steps to significantly reduce this number from 27 to 6 over the last year. This is reasonable due to the diversity of types of workers/skills required.

Agencies we use :

- Absolute Recruitment UK
- Crimson Ltd
- KPI recruiting Ltd
- Parker Recruitment Ltd
- Recruit (Gibraltar) Ltd
- Red Wigwam Ltd

Our Policies on Slavery and Human trafficking

Summary

We are committed to working to ensure that we have processes in place to prevent modern slavery or human trafficking in our supply chains or in any part of our business. In addition to the policies listed below, that reflect our commitment to acting ethically and with integrity in all our business relationships, we have now introduced a specific policy on modern slavery.

These include:

- Equality & Diversity
- Disciplinary & Grievance.
- Right to work
- Working time directive
- Flexible Working
- Anti-Bribery & Corruption
- Gifts & Hospitality
- Bullying & Harassment
- Corporate Social Responsibility
- Whistleblowing

Due Diligence

Audit and Due Diligence

- Yearly checks with agencies who are asked to complete 'A Minimum standard for labour providers declaration'.
- Checks to identify possible address/emails/mobile phone number/ bank account duplications.
- Raise awareness through posters in the warehouse – these will be provided in 10 different languages .
- Thrive mandatory training sessions.
- New systems that identify duplicate records entered at application and selection point across the group.
- Fully investigate and follow up and potential occurrences, 1 highlighted in 2020.
- Where we have recruited through an agency, we have requested their Modern Slavery statement and signed our 'A Minimum standard for labour providers declaration'.
- Agencies are required by us to confirm that they abide by the Minimum Standards for Labour providers set out by the Sedex GSNFR Working Group.

Training and awareness

Summary

We are committed to ensuring our managers and colleagues understand modern slavery and human trafficking in our supply chains and our business, how to prevent it, identify it, and act if an incidence is discovered.

We have taken the following steps:

- We launched an E-learning course in 2018 raising awareness of the risks of modern slavery. This now forms part of our basic induction.
- The course is also part of our mandatory training, which is renewed on an annual basis. 92.76% of our colleagues have completed the 2019 module and refreshed in 2020 with 96.12% of colleagues completing.
- 98 colleagues, including line managers and colleagues in areas such as Recruitment and Security have received face-to-face or virtual training to understand how they can spot signs to help identify if a colleague is at risk and what to do if they suspect an incident.
- This training course is now located on our training platform 'Thrive' for all colleagues in the business to view
- This training course will be refreshed and become part of our mandatory bite sized training program from 2021

Modern Slavery Performance Indicators

Performance indicators

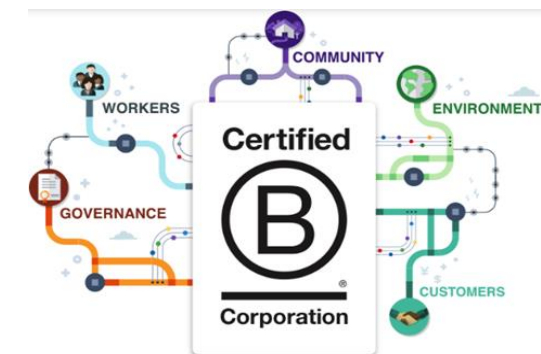
We use the following methods to measure how effective we have been to ensure that modern slavery and human trafficking is not taking place in any part of our business:

- Monitoring why colleagues leave our business by Leaving Interviews and post-employment surveys of colleagues who have left our business.
- Colleague feedback - we have introduced an “always on” ‘How Do You Feel Today?’ question to enable colleagues to tell us how they are feeling when ever they want, this can be anonymous. We now have 2500 active users.
- Tracking and monitoring training completion and confidence levels in terms of understanding modern slavery post-training.
- Level of communication and personal contact with our customers and suppliers to ensure their understanding of, and compliance with, our expectations.
- Monthly analysis of colleague data to identify patterns e.g. number of people at one address, multiple use of same mobile number.
- Whistleblowing hotline

Tactical Solutions

Certified B Corps are a new kind of business that balances purpose and profit. They are legally required to consider the impact of their decisions on their workers, customers, suppliers, community and the environment. This is a community of leaders, driving of a global movement of people using businesses as a force for good.

- **Governance:** mission & engagement, accountability, ethics and transparency
- **Workers:** compensation, benefits, training, worker ownership, communication, flexibility, culture
- **Community:** job creation, diversity & inclusion, local engagement, customers & suppliers
- **Environment:** land, office, plant, inputs & outputs
- **Business model:** e.g. social impact of products / services



The B Corp community works toward reduced inequality, lower levels of poverty, a healthier environment, stronger communities, and the creation of more high quality jobs with dignity and purpose. They use profits and growth as a means to a greater end: positive impact for their employees, communities, and the environment.

White Hinge

White Hinge Limited

- White Hinge Limited is a business Dee Set acquired on 7th October 2018
- They are eCommerce Experts who sell over 15,000 lines across several Online Marketplaces
- They also provide Digital Development & Support services, including Warehouse Operation Services, for Online Retail Customers

White Hinge Limited Modern Slavery Policy and Due Diligence

- White Hinge Limited work with several suppliers throughout the UK and the EU
- With each supplier that we choose to work with, we create a thorough understanding of the supplier chain
- From this point we aim to ensure to only work with those suppliers who operate within our expected standards
- From 2021 we aim to review these supplier chains on a yearly basis to monitor any changes

Progress/ Further Steps

Business Unit	Commitment	Status	Additional Comments
Imports/ Supply Chain	Reissue ethical standards to all far east suppliers	Ongoing	Dee Set had planned to implement a new Dee Set driven ethical standards charter which we expect all suppliers from Far East to sign and be compliant with. Due to impact of COVID on working operations, this was not fully achieved, but is expected to be completed by end of 2021
Doggie Solutions	Issue position to all suppliers, 35 Suppliers, 50% overseas, including several UK manufacturers	Ongoing	During Feb 2021, Dee Set acquired a small eCommerce based business, Doggie Solutions. The business was relatively small with turnover £1m, and as such had not previously been required to submit a Modern Slavery statement. Being part of Dee Set group this will be required ongoing and work is underway to audit all suppliers and agree standards, but due to short timeframe and large supplier base, this was not completed for 2020 statement
People	Contacted agencies that supply colleagues to us with our declaration	Completed	Reduced workforce suppliers from 27 to 6 agencies throughout 2020. The suppliers we now work with are Absolute, Crimson, KPI, Gibraltar Recruit, Red Wigwam, Parker (transport-agency drivers) ,GAP
People	Trent to develop reports in Business Objectives that would show colleagues who have same mobile numbers, home addresses, shared bank accounts and email addresses	Completed	This report is now readiness available and way of working in place for the People Team business partners to review and take action accordingly
People	Raising awareness within our business on Modern Slavery looking for the signs of this in the with colleague engagement including posters and information in various languages	Ongoing	10 different languages needed to support this messages across our Stoke Warehouse. This did delay work throughout 2020 but is planning to be completed within June 2021
People	Make use of various websites as a resource for literature and knowledge	Ongoing	https://www.gov.uk/government/collections/modern-slavery , https://www.stonger.together.org/learn/no-businesses-uk/
People	Reduce the number of agency resource being across the group	Completed	We have reduced the our agencies from 27 to 6 in 2020 overachieving our set internal targets. Although no action is needed we will continue to monitor going forward and reduce if required in the next 12 months
Fulfillment	Agency Spot Checks to be requested	Ongoing	Agency workers companies are requested to complete spot checks on there workers, this is completed on site at the beginning of shift and data is now stored within the GDPR guidelines

Progress/ Further Steps

Business Unit	Commitment	Status	Additional Comments
Recruitment	Recruitment Team Awareness	Ongoing	Ensure the recruitment team are aware of Modern Slavery and Key Identifiers to look out for. Ongoing awareness within the team through meetings. To build on this, in 2021 we will be asking for Right to Work documents to be provided at interview stage
Recruitment	New agencies we engage with return Declaration (Minimum Standard for Labour Providers)	Completed /Ongoing	Before any new agencies are used the Modern Slavery Declaration must be returned by the agency and retained on file
Recruitment/Systems	eArcu system ensures that we do not have duplicate email addresses for candidates and that they are genuine	Ongoing	Launches in February 2021 which is 3 months behind schedule
Recruitment/Systems	Right To Work documents are all stored in one secure place, settled status is also being used by candidates.	Ongoing	Launches in February 2021 which is 3 months behind schedule
Learning and Development Training- Colleagues	Annual refresher training across the group through Thrive	Ongoing	We now have a mandatory calendar for all eLearning training across the group. Modern slavery will run for 2 months throughout January and February to ensure we capture all 3500 colleagues in the field, support offices and warehouse
Learning and Development Training-Leaders	Training of our leaders across the group	Ongoing	
L&D	Modern Slavery working group attended the Stronger Together webinar to grow understanding	Completed	Working party attended webinar on Modern Slavery. Review whats up and coming and add delegates to the courses
eArcu/Trent	Equality & Diversity questionnaire has been added to the recruitment process and we can report at application, selection and recruitment stage	Ongoing	E&D measures are being collected for the existing workforce in Trent. Work will start on this in early 2021