



DEE SET

Modern Slavery Statement: 2021



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Modern Slavery 2021

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 3200 people across the group. This statement covers our group of companies 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
- eCommerce – White Hinge
- IT / Data solutions



Greg Phillips
Chief Executive Officer

This statement was approved by the board of Dee Set



DEE SET

We help retailers and brands sell more.

Our Business



3,200+

Colleagues working
across the group



1,600,000+

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



250,000+

Units picked per week
in our warehouse

Two other businesses that form part of the Dee Set Group:



Our partners



MHR being our
partners using the HR
iTrent systems



eArcu partnership in
recruiting the right
People



Partnering with Sapia
means we are
recruiting the best
talent



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



Blink our two way daily
communication with
our colleagues in the
field and in support
offices creating a real
community
environment

Product Supply

Summary

- We act as an intermediary for the consolidation and distribution of products into three major retailers; Asda, Morrison's and Wilko's
- This accounts for 202 of our suppliers, and approximately 90% of our volume 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 69.09% of the supplier volume dispatches
- All supply chain colleagues have completed the reviewed online learning of Modern Slavery
- In 2021 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

Links for the top 3 suppliers statements:

Essence - [Statement](#) L'Oreal - [Statement](#) Coty - [Statement](#)



Product Supply

Import Supply Chain (Far East)

- Currently we use three suppliers in Far East, with the majority of stock being imported through our main partner “on-time”
- In 2021 “On-Time” were successfully re-audited via Sedex, with three corrective actions highlighted – which have all now been resolved
- “On-time” will be audited again in 2022
- In 2021, All new factories that our suppliers work with were issued a bi-lingual copy of Dee Set’s Ethical sourcing standards, detailing the below:
 - 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
- In 2022 these standards will be re-circulated to all factories we are associated with



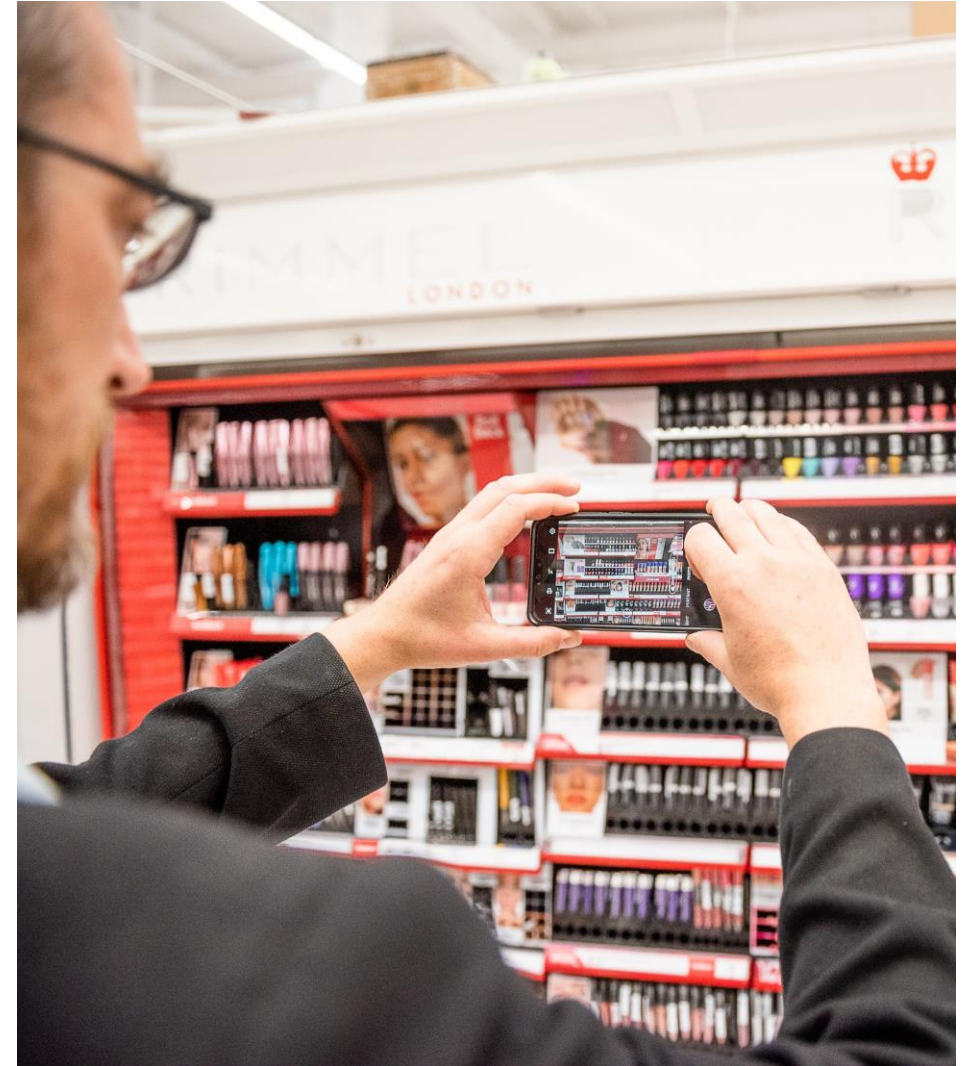
Labour Providers

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 worked hard to significantly reduce this number from 27 to 10
- We view this as still a reasonable amount of agencies due to how diverse our Group is with of types of workers/skills required

Agencies we use:

- 365
- GAP
- SID
- Proactive
- Work LYF
- Absolute
- KPI
- Red Wigwam
- Recruit (Gibraltar)
- Bow draper



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 (eLearning platform) 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, one highlighted in 2021
- 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

In quarter 4 of 2021, we completed mandatory training for all colleagues across the group. This was accessed and complete through a training platform, Thrive. We then followed this up with a Mandatory virtual training session with all managers and supervisors across the group.

86% of colleagues within the Dee Set Group have completed a mandatory online module

- Dee Set = 86%
- White hinge = 92%
- Tactical Solutions = 82%

41 virtual workshops for Managers and Supervisors held across the group, 369 attendees

- 84% managers and supervisors across the Dee Set Group attended a virtual workshop

Where we see the gaps are where we had large absent rates as we saw peaks during Covid as absence consistently ran at over 15%. These will be held again throughout 2022



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. These are now completing through our HR system MHR iTrent
- Colleague feedback - we have introduced an “always on” ‘How Do You Feel Today?’ question to enable colleagues to tell us how they are feeling whenever they want, this can be anonymous. We now have 3,000 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

Tactical Solutions are working to attain Bcorp certification and as part of this we are working within their framework where legally we are required to consider the impact of our decisions on our workers, customers, suppliers, community and the environment. Bcorp is a community of leaders, driving a global movement of people using businesses as a force for good and as such Tactical Solutions are currently being audited to ensure our governance and working practices are in keeping with their ethos of doing business for the good of our workers, the environment and the wider communities.

- **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 Limited

Summary

- White Hinge Limited is a business Dee Set acquired on 7th October 2018
- They are eCommerce Experts who sell over 15000 lines across several Online Marketplaces
- They also provide Digital Development & Support services, including Warehouse Operation Services, for Online Retail Customers

Due Diligence & Warehouse Operations

- White Hinge Limited office Colleagues are recruited through the Dee Set Group and thorough checks are made during the interview stages
- Warehouse Operations can, as required, use Agency Workers. These workers are recruited and assessed using the Dee Set Group standards and requirements as documented earlier

Supplier Chain

- White Hinge Limited work with several suppliers throughout the UK and a small few suppliers are from the EU
- With each supplier that we choose to work with, we create a thorough understanding of the supplier chain
- We aim to ensure to only work with those suppliers who operate within our expected standards
- During annual meetings with each supplier, for those suppliers with chain details, we discuss and review 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 summer of 2022. One of our main suppliers has been audited and we have a few actions to go back on.
Doggie Solutions	Issue position to all suppliers	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 MS 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 2021 statement. To be tied in with Imports.
People	Contacted 5 agencies that supply colleagues to us with our declaration	Ongoing	Reduced from 27-7 agencies however with COVID and the impact of Brexit we have had to increase this to 10. -(3 other agencies have been added Proactive, Valiant and Page recruitment).
People	Asked for iTrent to develop reports in Business Objectives that would show colleagues who have same mobile numbers, home addresses, shared bank accounts and email addresses	In development	Meeting went ahead reports were generated, and action needed with regards to what actions are required from each report with set governance within the team
People	Look into raising awareness within our business and to start within our warehouse with colleague engagement including posters and information in various languages etc	Initial stage	All of the notices around the stoke warehousing operation and now delayed in 6 different languages including all modern slavery policies and awareness posters
People	Make use of various websites as a recourse for literature and knowledge	Ongoing	As above.
People	Reduce the number of agency resource being used across the group	Ongoing	No action needed monitor going forward.

Progress/ Further Steps

Business Unit	Commitment	Status	Additional Comments
Recruitment	Team Awareness	Ongoing	Ongoing awareness within the team through meetings. Right-to-work documents are now shown at the interview stage. We cannot store these documents at this stage in the process.
Recruitment	Any new agencies we engage with return Declaration (Minimum Standard for Labour Providers)	Ongoing	No action needed.
Training- Colleagues	Annual refresher training across the group through Thrive	December/Ongoing	We run these sessions from January through to March. these were attended either virtual training sessions with line managers or E-learning for all colleagues. These are now due to be run annually
Training-Leaders	Training of our leaders across the group	Completed/ Ongoing	Mandatory training for managers completed and will now be run annually
Recruitment/Systems	eArcu system ensures that we do not have duplicate email addresses for candidates and that they are genuine	Completed	Live, checked and ongoing for email addresses
Recruitment/Systems	RTW documents are all stored in one secure place, settled status is also being used by candidates.	Ongoing	Live, ongoing reporting to managers.
L&D	Modern Slavery working group attended the Stronger Together webinar to grow understanding	Completed	Working party to attend next webinar on Modern Slavery.
eArcu/iTrent	Equality & Diversity questionnaire has been added to the recruitment process and we can report at application, selection and recruitment stage	Ongoing	Ongoing.



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For more info visit:
deeset.co.uk

