



Modern Slavery Statement

2022



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Modern Slavery 2022

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 £100 m, 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 are often well hidden by the perpetrators with victims reluctant to come forward. Dee Set is 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

This statement was approved by the board of Dee Set



Greg Phillips
Chief Executive Officer

Our Business



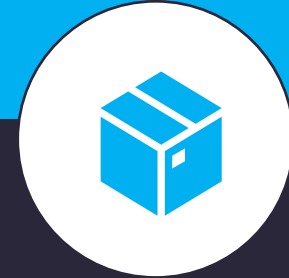
3,200+

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



Wagestream is our financial wellness platform, enabling colleagues to gain greater financial flexibility and control

Product Supply

Summary

- We act as an intermediary for the consolidation and distribution of products into three major retailers; Asda, Morrison's, Wilko's, and Poundland.
- This accounts for 229 of our suppliers, and approximately 83% of our volume with suppliers
- We source a number of our own products for supply to retailers, directly from China, which are classed as "Dee Set imported" items.

Consolidated Supply Chain

- Our top 10 suppliers account for approximately 78% of the supplier volume dispatches.
- All supply chain colleagues have completed the reviewed online learning of Modern Slavery.
- In 2022 we had planned to assess the 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 6 supplier's statements:

Incomm - [Statement](#)

PVM - [Statement](#)

L'Oreal - [Statement](#)

Coty - [Statement](#)

Cosnova - [Statement](#)

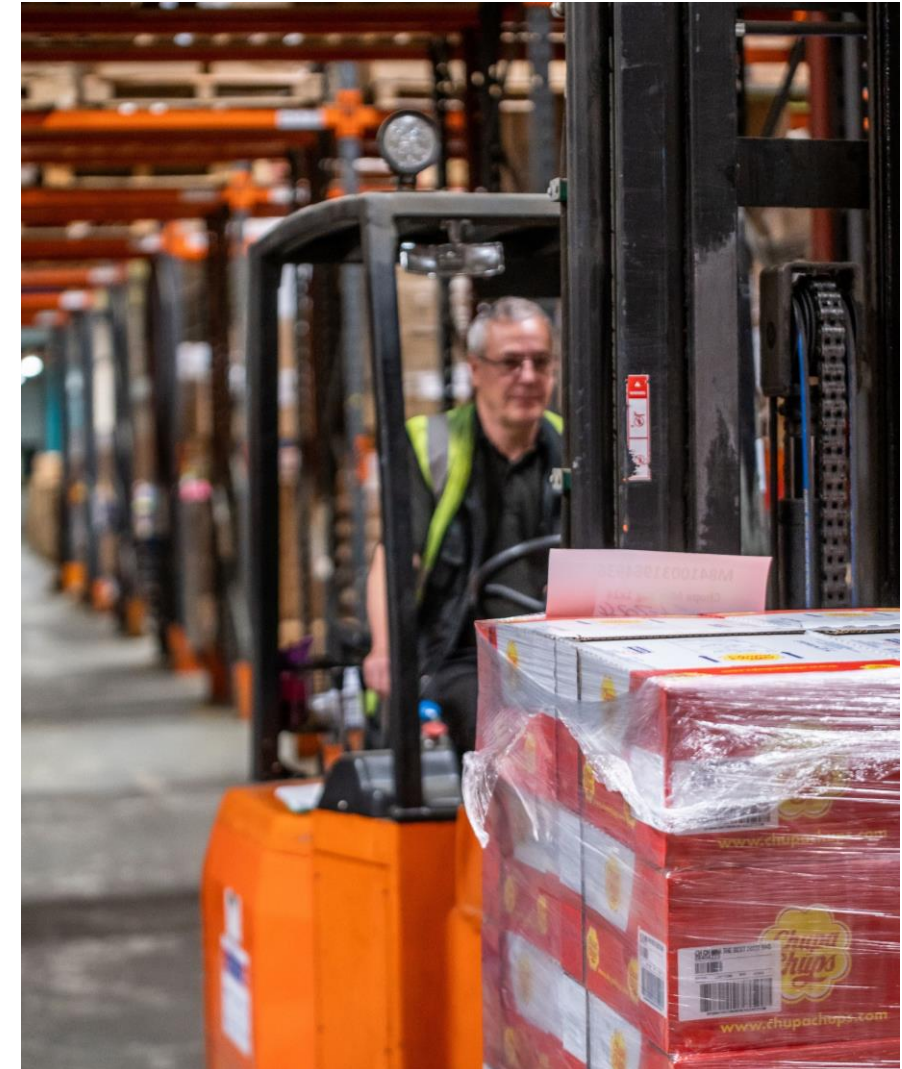
Meiyume - [Statement](#)



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 2022 18th August “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 2023.
- In 2022, 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 2023 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 7.
- 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:



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 2022.
- 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 2022, we completed mandatory training for all colleagues across the group. This was accessed and completed through a training platform, Thrive. We then followed this up with a Mandatory virtual training session with all managers and supervisors across the group.

89% of colleagues within the Dee Set Group have completed a mandatory online module

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

41 virtual workshops Managers and Supervisors held across the group, 378 attendees

- 84% of managers and supervisors across the Dee Set Group attended a virtual workshop
- 1 and half hour courses for 146 managers achieving 88% coverage
- 30-minute courses for 232 supervisors achieving coverage of 86%

An increase of long term sick colleagues post COVID impacted the overall numbers.

These will be held again throughout 2023

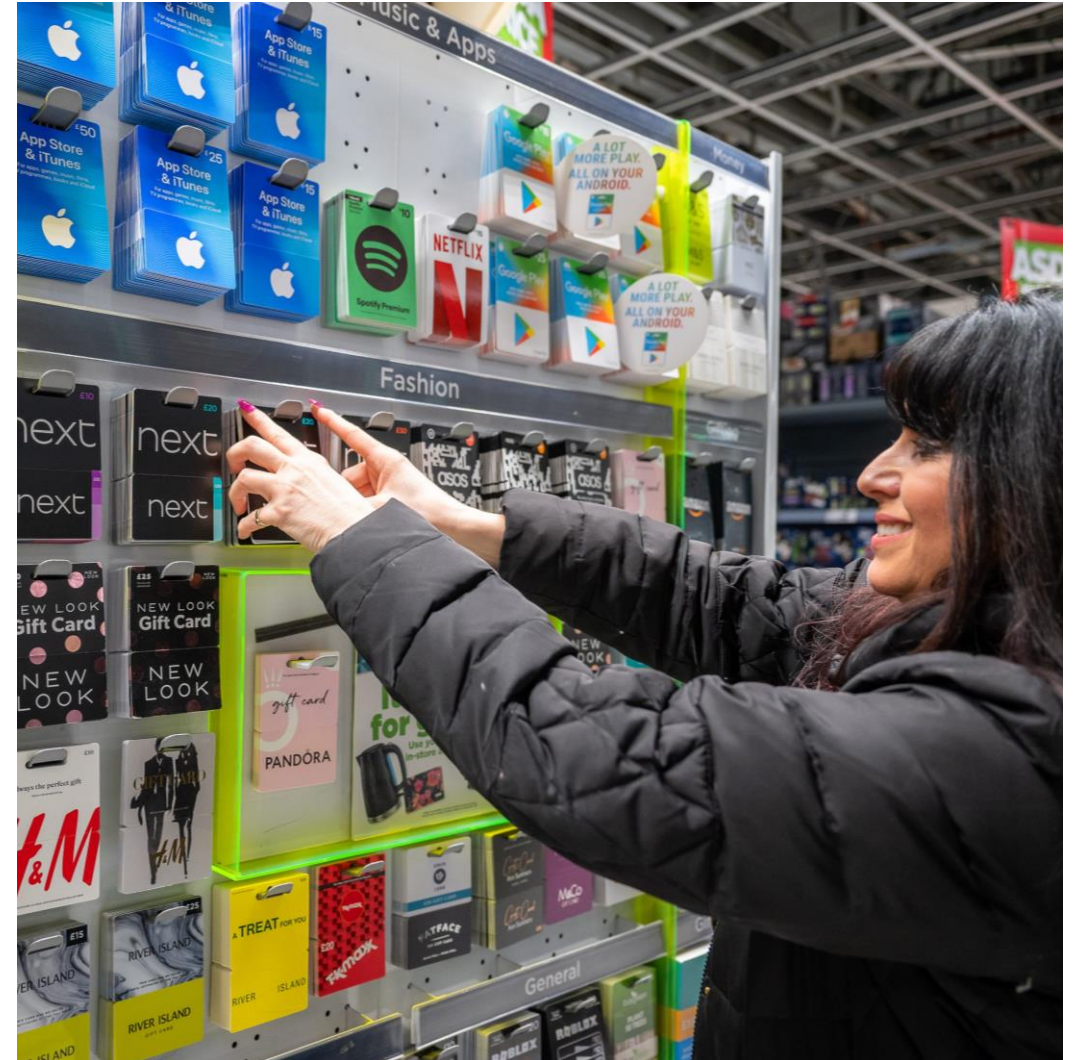


Modern Slavery Performance Indicators

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 have been accredited B Corp 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. B Corp 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 towards 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

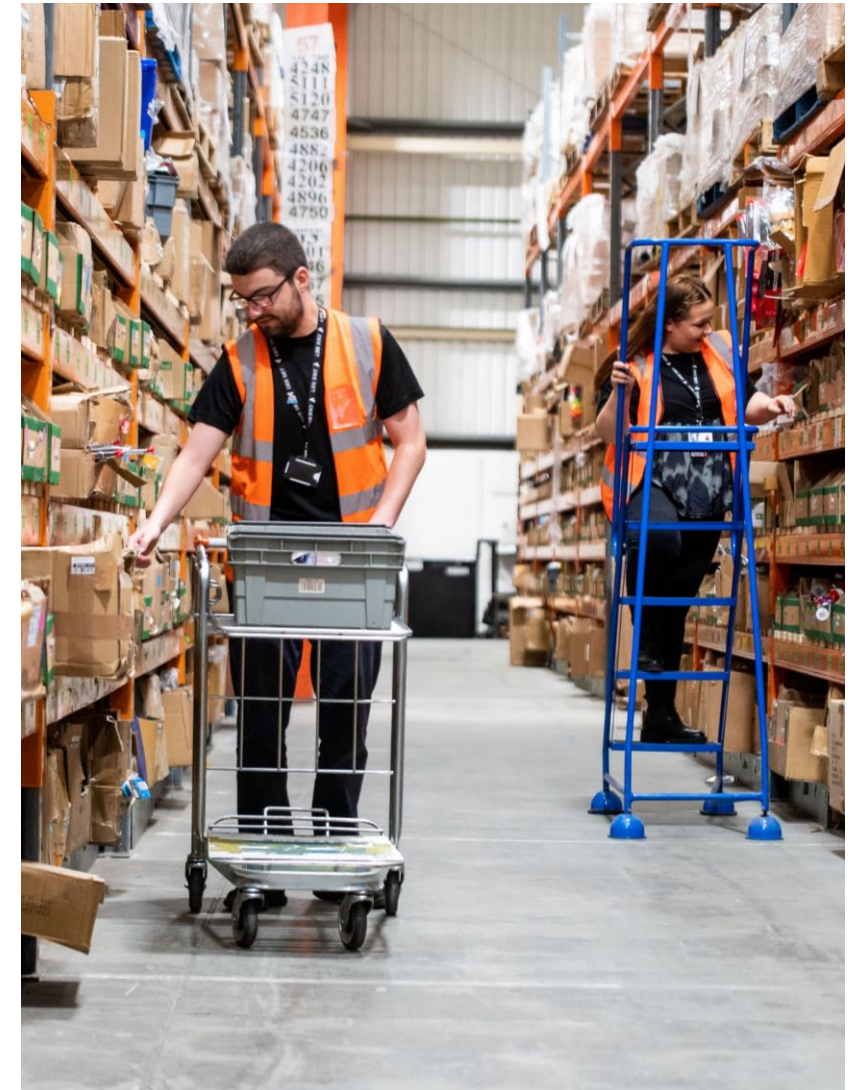
- White Hinge Limited is a business Dee Set acquired on 7th October 2018.
- They are eCommerce Experts who sell over 15000 lines across several Online Marketplaces.
- They also provide Digital Development & Support services, including Warehouse Operation Services, for Online Retail Customers.

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	Develop governance of onboarding New Suppliers	In Progress	Circulation of document for feedback by the stakeholder group. Sign off and but into working for 2023
Imports/ Supply Chain	Ongoing Annual audits / ethical standards declaration from our far east suppliers	Ongoing	This is an ongoing action that will continue yearly
Doggie Solutions	Develop Group supplier onboarding document that encompasses Modern Slavery and ethical standards	Ongoing	Document circulated for group review. sign off and put into ways of working for 2023
Doggie Solutions	Ongoing Annual audits / ethical standards declaration from our far east suppliers	In Progress	10/02 followed up for response from Nanhai Native post CNY.
People	Commitment to engage with agencies and send out new minimum standards for labour providers declaration for each agency to complete	Ongoing	After engaging with all areas of the business we now have 5 out of the 7 agencies to contact: Proactive, Worklyf, Absolute, Polly and KPI. Currently discussing the possible consequences of companies who do not reply with requests.
People	Ensure a process is developed to check for signs of possible signs of modern slavery with in our colleagues	In Progress	We will develop a process to check duplicate living addresses, phone numbers and personal email addresses. This process will be defined and in action for Q2 2023
People	Highlighting modern slavery with our warehouse colleagues	Ongoing	Posters are up in Head Office, these will need to be refreshed to keep the message clear and current, we are also engaging with the Warehouse team. These will be displayed in 11 different languages
People	Define the process for agencies and people / duplicates/investigation	In Progress	We're currently looking at this process and planning to have this implemented in Q2 of 2023

Progress / Further Steps

Business Unit	Commitment	Status	Additional Comments
Recruitment	Team Awareness	Ongoing	Ensure the recruitment team are aware of Modern Slavery and Key identifiers to look out for on an ongoing basis, refreshed through team meetings and mandatory Thrive training. further training will be rolled out in 2023
Recruitment	Any new agencies we engage with must return Declaration (Minimum Standard for Labour Providers)	Ongoing	Before any new agencies are used the Modern Slavery Declaration must be returned by the agency and retained on file. outstanding is Recruit Gibraltar
Training- Colleagues	Annual refresher training across the group through Thrive	Ongoing	Checking the completion rates on Thrive, completion league tables implemented to drive compliance. Training runs January - March yearly. Next sessions planned in 2023
Training-Leaders	Training of our leaders across the group	Ongoing	Training runs January - March (23 x 1.5 hour course for 146 line managers and 18 x 1 hour course for 232 supervisors). Rather than a workshop this will be an additional 20 minute bolt on course for managers. This course will detail the importance of spotting the signs, sharing the statistics and dealing with a potential MS risk. This will also run January - March.
Recruitment/Systems	eArcu system ensures that we do not have duplicate email addresses for candidates and that they are genuine	Completed	Launched Feb 18th 2021 - Live and ongoing, eArcu has email verification built in the platform.
Recruitment/Systems	RTW documents are all stored in one secure place - Online share codes are checked by the recruitment team - Investigate Data Storage	Ongoing	Launched Feb 18th 2021 - Live and ongoing, reporting to managers, under current process the digital process April 2022 does not really fit the business. HR project to commence to standardise documentation format - also to include White Hinge and Tactical Solutions.
L&D	Stay up to date with Modern Slavery actions / revisions	Ongoing	Reviewing what's up and coming, adding delegates to courses. Revision of virtual manager training for colleagues, revision of virtual course, to online training for managers. Stronger Together Website for additional resources.
eArcu/iTrent	Equality & Diversity questionnaire has been added to the recruitment process and we can report at application, selection and recruitment stage	Ongoing	This will continue annually



For more info visit:
deeset.co.uk

