

 DEE SET | GROUP

# Modern Slavery

STATEMENT 2023

Helping Retailers  
and Brands Sell More

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## Modern Slavery Statement 2023

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.

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# Modern Slavery 2023

## 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 3,200 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



**Greg Phillips**  
Chief Executive Officer

*This statement was approved  
by the board of Dee Set*

Section 02

# 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:



Section 03

# 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

- ✓ Dee Set act as an intermediary for the consolidation and distribution of products into two major retailers; Asda and Poundland.
- ✓ Our own products are sourced for supply to retailers, directly from China, which are classed as “Dee Set imported” items.
- ✓ Dee Set also offer a 3PL service, delivering suppliers product to most UK retailers.
- ✓ All supply chain colleagues have completed the reviewed online learning of Modern Slavery.

## Consolidated Supply Chain

- ✓ Dee Set's top 10 suppliers account for approximately 46% of the supplier purchases in 2023.
- ✓ In 2022 Dee Set 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.
- ✓ 2023 saw Wilko go into administration and close, Wilko accounted for around 30% of Dee Set's volume.
- ✓ AFB was introduced into Asda for the supply of hair products in replacement for Glow.

## Links for 6 Top Supplier Statements:

Cosnova - [Statement](#)

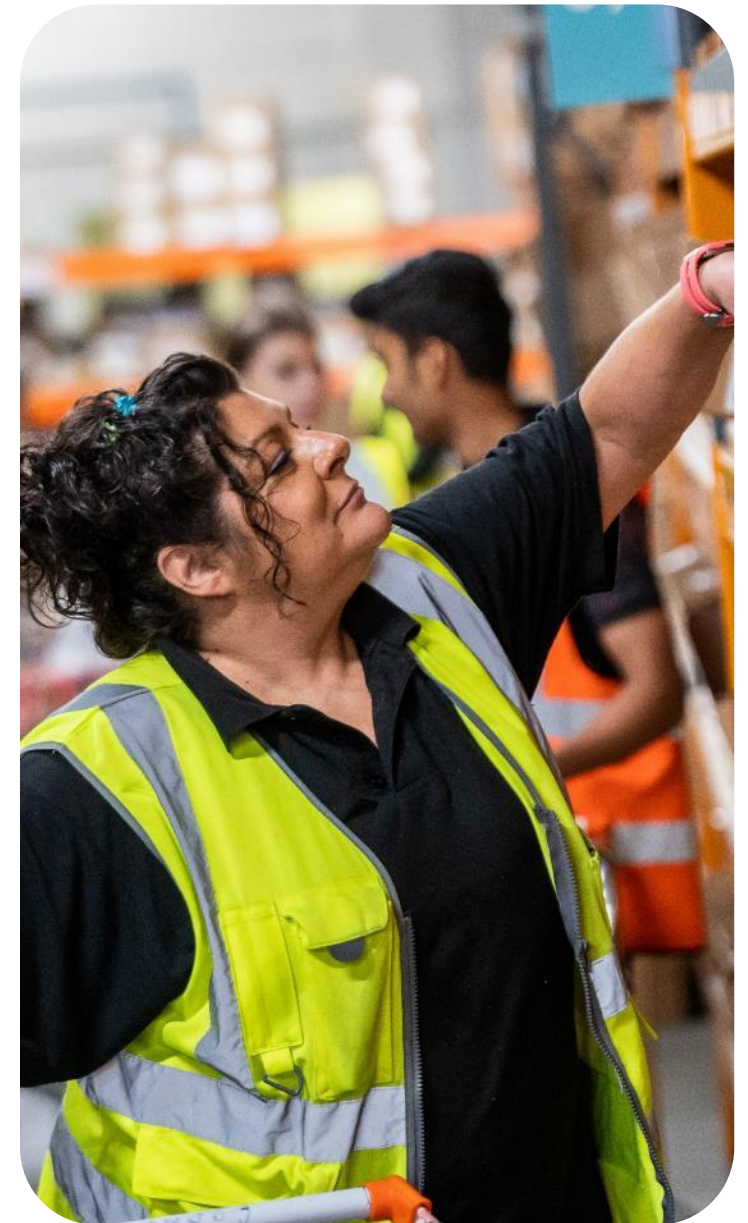
L'Oreal - [Statement](#)

COTY - [Statement](#)

Meiyume - [Statement](#)

Incomm - [Statement](#)

Mattel - [Statement](#)



# Product & Supply

## Import Supply Chain (Far East)

Currently we use three suppliers in Far East, with most of the stock being imported through our main partner, “on-time”

- ✓ On 15th September 2023 “On-Time” were re-audited via a semi announced [Sedex](#) 2 pillar audit (Labour standards, and Health & Safety). Three corrective actions were highlighted – of which 2 are outstanding relating to overtime and social insurances. We will be working with "on-time" through 2024 to understand how we can help improve these, for example with collaborative forecasting
- ✓ Our second largest supplier also received an [Amfori](#) Social audit in November 2023 - with factory achieving overall grading of C
- ✓ Dee Set continue to issue all suppliers with our Bi-Lingual ethical standards, working in line with the [ETI base code](#) -
  - 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
- ✓ All suppliers will be re-audited in 2024



# 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 7 to 4.
- ✓ We view this as still a reasonable number of agencies due to how diverse our Group is with of types of workers/skills required.

## Agencies we use:





## Section 06

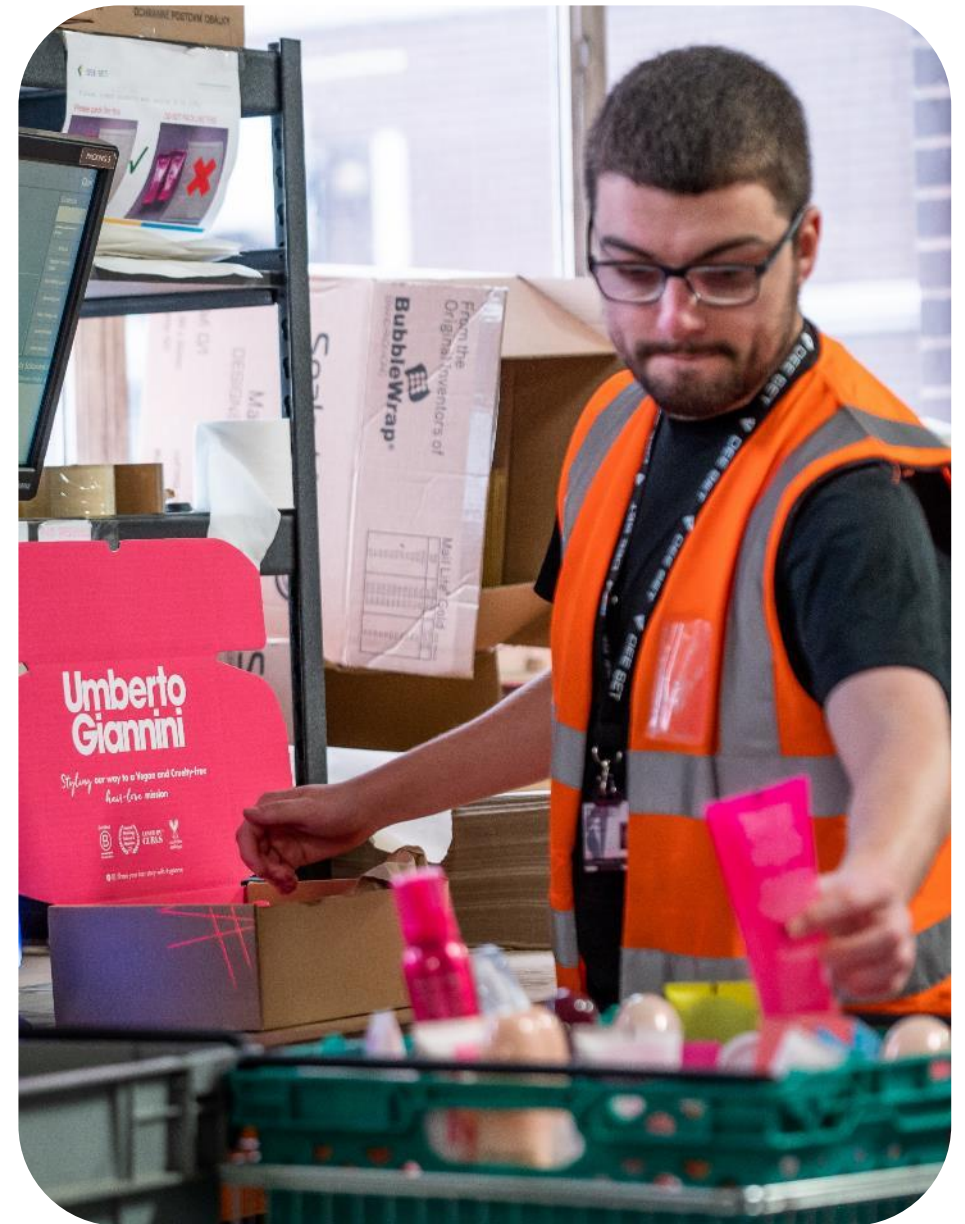
# Our Policies

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



## Section 07

# Due Diligence

## Audit and Due Diligence

- ✓ Engaged with agencies and send out our 'Minimum Standards for Labour Providers' declaration for each agency to complete and return to us
- ✓ Implemented a monthly process and workflow to check for signs of Modern Slavery with our colleagues, which include checking duplicate email address, phone numbers, bank accounts and home addresses.
- ✓ Raised awareness in our warehouse with communications in various languages in communal areas around our Head Office
- ✓ Thrive (eLearning platform) mandatory training sessions



# Training & Awareness

## Summary

From January through March each year, our learning and development focus is on Modern Slavery Training. We annually introduce new and updated refresher courses across the business via Thrive. Furthermore, our induction pathways include Modern Slavery and Bribery & Corruption training to ensure all new starters are well-informed on these critical subjects.

Additionally, our Thrive Explore page provides a wealth of resources and tools for colleagues to further enhance their awareness. They can access e-learning courses, articles, and videos designed to deepen their understanding of these important issues.

## 2023 compliance stats were:

- ✓ Dee Set Group – 90% (+4 %)
- ✓ Tactical Solutions – 93% (+1%)
- ✓ White Hinge – 100% (+14%)

These stats are a significant increase from last years stats. We report on the compliance every month throughout the year and deliver league tables to each area of the business to help drive the Modern Slavery initiative.

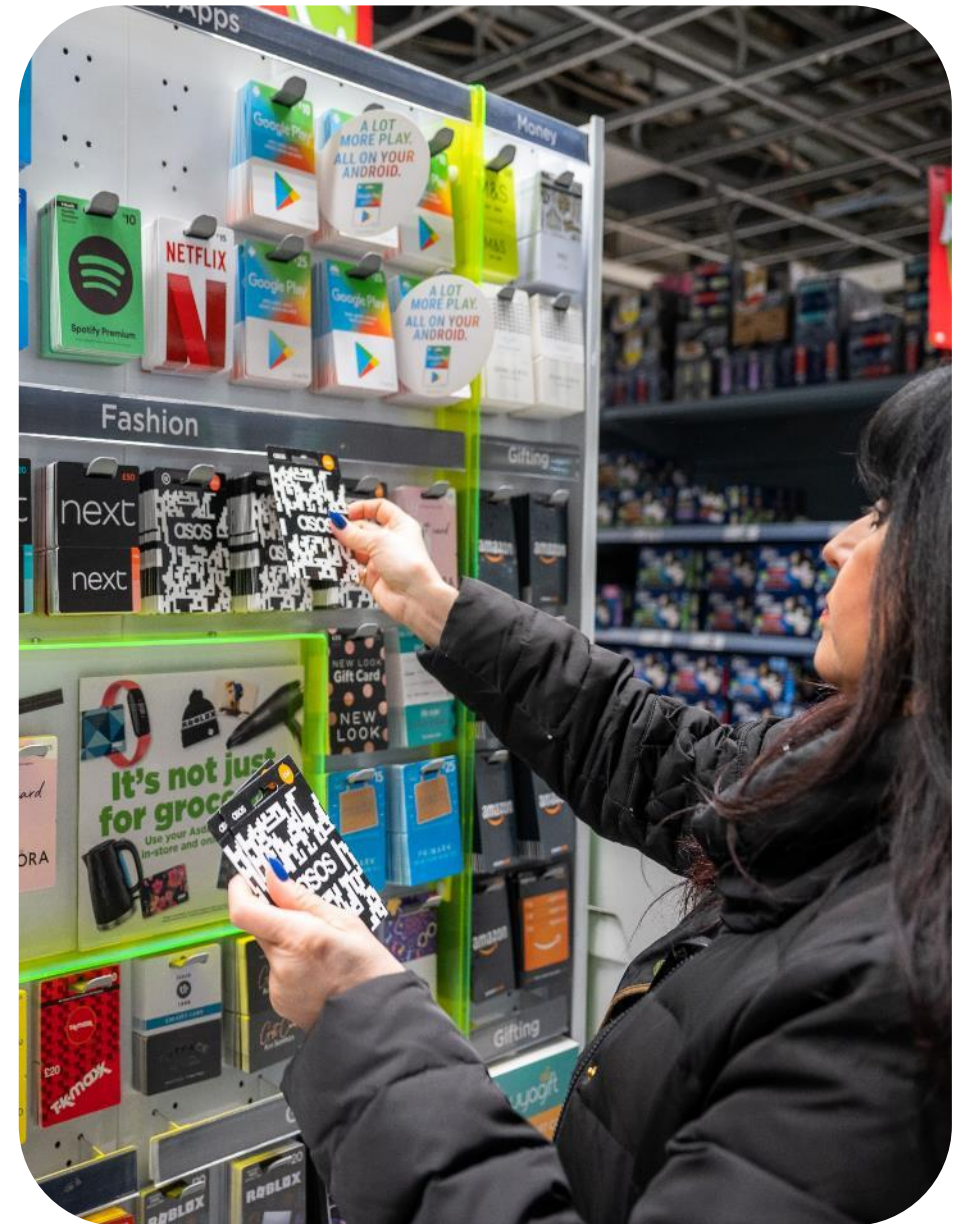


## Section 09

# Modern Slavery 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



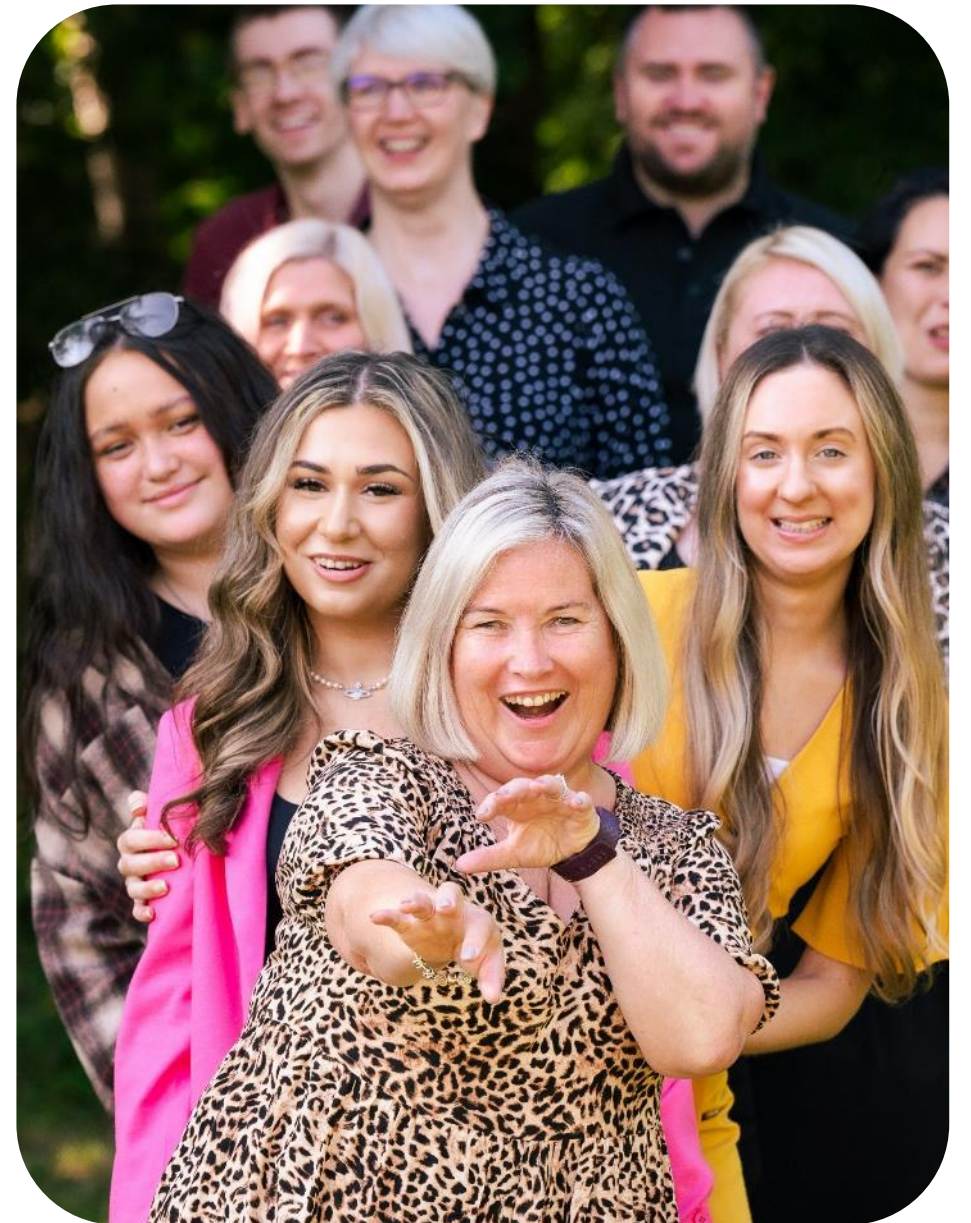
## Section 10

# 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 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.

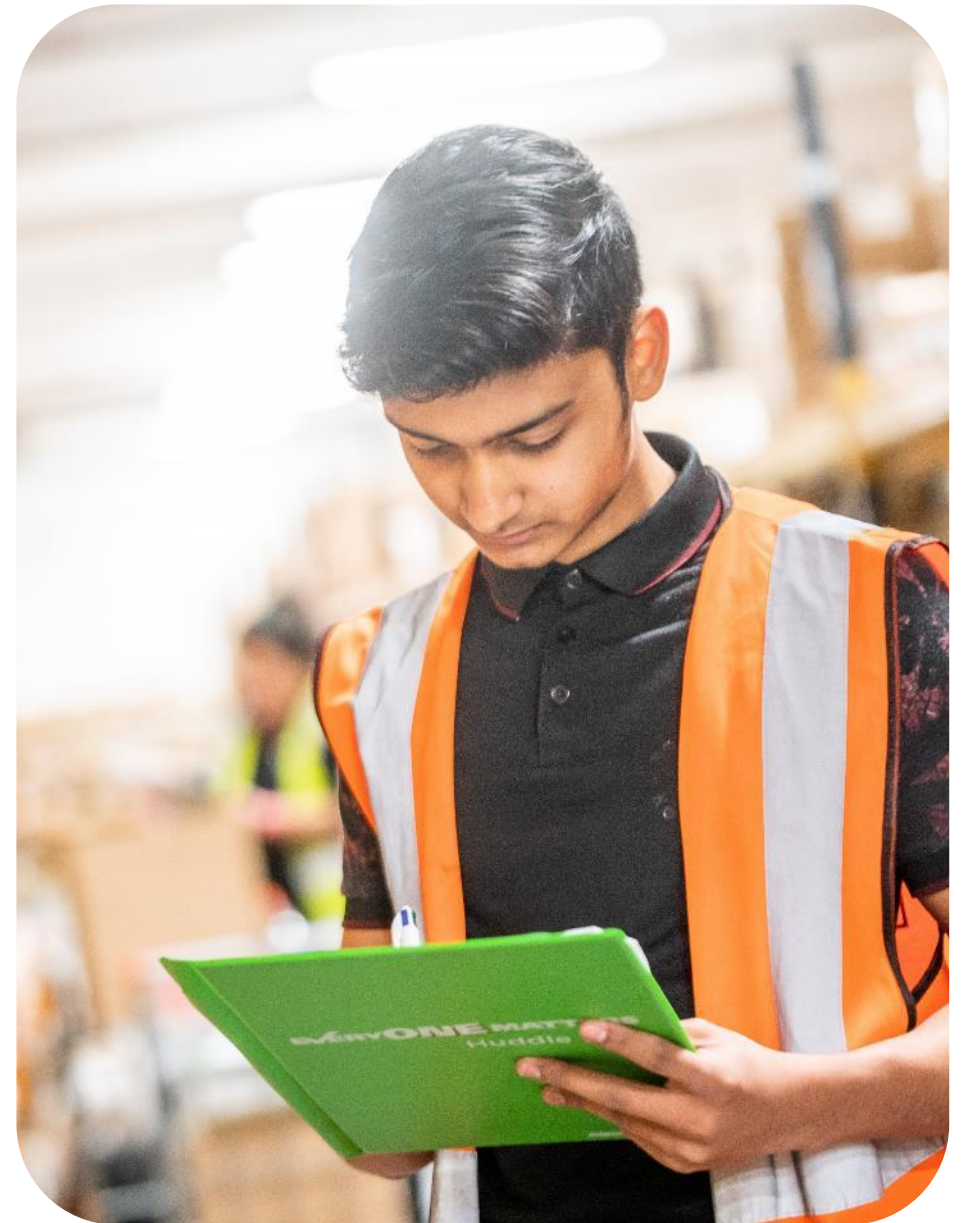


# White Hinge Limited

## Statement

“At White Hinge, we are committed to upholding the highest standards of ethical conduct and social responsibility in all aspects of our operations. As part of this commitment, we unequivocally condemn all forms of slavery, forced labour, and human trafficking. We recognise the grave injustice and human rights violations associated with these practices, and we are dedicated to ensuring that they have no place within our supply chain or any aspect of our business.”

1. **Supplier Engagement and Collaboration:** We will work closely with our suppliers to promote transparency, accountability, and ethical practices throughout our supply chain. This includes providing guidance and support to help them improve labour standards and address any identified risks of Modern Slavery
2. **Zero Tolerance Policy.** We maintain a zero-tolerance policy towards Modern Slavery & forced labour. Any supplier found to be involved in such practices will be immediately terminated from our supply chain, and we will take appropriate legal action as necessary.
3. **Colleague Awareness.** We will provide training and education to our employees to raise awareness about the risks of slavery and human trafficking and empower them to identify and report any suspicious activities or violations of our anti-slavery policy.



## Section 12

# Progress / Further Steps: **Supplier Diligence**

The following suppliers have been contacted (May 24) to seek information on their Modern Anti-Slavery policies and what process/procedures are in place to mitigate:

- ✓ MP Smith
- ✓ Sure Health
- ✓ Toolzone
- ✓ Chase Hardware
- ✓ Merriway

Top 5 suppliers (spend). Once complete, we will then look at next set of suppliers/couriers (July 24).



## Section 12

# Email Sent to Suppliers

Dear Supplier,

I hope this email finds you well. As part of our ongoing commitment to corporate social responsibility and ethical business practices, we are conducting a review of our supply chain to ensure compliance with anti-modern slavery standards.

As one of our valued suppliers, we kindly request that you provide us with documentation outlining your company's anti-modern slavery policies and practices. This information will help us assess the measures in place to prevent and address any potential risks of modern slavery within our supply chain. Specifically, we are interested in obtaining the following:

1. Your company's formal policy statement on modern slavery and human trafficking.
2. Details of the procedures and controls implemented to identify and mitigate modern slavery risks.
3. Any training programs or initiatives conducted to raise awareness among your employees and suppliers about modern slavery issues.
4. Information on how your company monitors and evaluates compliance with its anti-modern slavery policies.
5. Any relevant certifications or accreditations related to ethical sourcing and labour practices.

We understand the importance of this matter and assure you that any information provided will be treated confidentially and used solely for the purpose of assessing our supply chain integrity. Please send the requested documentation to me by 30th June, 2024. Should you have any questions or require further clarification, please don't hesitate to contact me directly.

Thank you for your cooperation and continued partnership in upholding ethical standards across our supply chain.

Best regards,



Section 12

# Progress / Further Steps

| Business Unit         | Status                              | Comments  | Additional Comments  |
|-----------------------|-------------------------------------|---|--|
| Imports/ Supply Chain | Ongoing into 2024                   | Sedex Annual audit / 3 Non-Compliance / 1 x Electrical / 2 x overtime related.  | Internal Update 24/04/24 - First conversation with "on-time" 9th April, they needed further discussions internally around the social insurances, and expect feedback shortly. For overtime they have noted this can be driven by shorter lead time requests, so we have committed to regular collaborative forecast meetings - though important to remember we are not there only customer so this is a practice they must embrace across all customers. |
| Imports/ Supply Chain | Ongoing into 2024                   | Issue with onboarding document - look to use lima for WH side of the business.  |  |
| Doggie Solutions      | Ongoing into 2024                   | No new suppliers onboarded.   | Internal Update 24/04/24 - Fare East supplier of dog crates slow in responses, looking to get crate counter quote from "on-time" as above.   |
| Doggie Solutions      | Ongoing into 2024                   |   | Internal Update 24/04/24 - No Doggie Solutions suppliers exceed £36m T/O so have not issue Modern Slavery Statements.  |
| People                | Ongoing                             | Process of completing self-audit to check for modern slavery concerns, i.e. duplicate email addresses, duplicate phone numbers etc, surnames same addresses.  |  |
| People                | Complete however continue into 2024 | Looking at agencies that we use to ensure we have captured all - in 2021 we worked with 27 agencies this has reduced to 5 in 2024 - Question are we allowed to audit an agency? What is the process to be followed. |  |
| People                | Complete however continue into 2024 | Raised awareness in the Warehouse of modern slavery, various languages used to communicate throughout the team.   |  |

| Business Unit | Status            | Comments   | Additional Comments   |
|---------------|-------------------|--|---|
| Supply        | Ongoing into 2024 | Sedex self assessment updated in 2023.   |   |
| Supply        | Ongoing           | Onboarding of AFB which supply a hair range for Asda - Modern Slavery Statement to be obtained.  |   |
| Supply        | Ongoing into 2024 | Loss of 2 major retailers in 2023 - Wilko which was mainly cosmetics and travels / Morrison's which was mainly Clipstrips and Party.   |   |
| Recruitment   | Complete          | February 2023 built a recruitment TUPE portal in eArcu to help us transition a large volume of colleagues from Hallmark into the business.   |   |
| Recruitment   | Ongoing           | eArcu, I Trent / Thrive and Sapia Modern Slavery Statements to be gained.  |   |
| Recruitment   | Ongoing           | Team awareness.  | 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 2024.  |
| Recruitment   | Ongoing           | Any new agencies we engage with must return declaration (Minimum Standard for Labour Providers).   | Before any new agencies are used the Modern Slavery Declaration must be returned by the agency and retained on file. Outstanding is Recruit Gibraltar.  |
| Recruitment   | Ongoing           | RTW documents are all stored in one secure place - Online share codes are checked by the recruitment team – Investigate Data Storage.  | 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. |
| Recruitment   | Ongoing           | eArcu system ensures that we do not have duplicate email addresses for candidates and that they are genuine.   | Launched Feb 18th 2021 - Live and ongoing, eArcu has email verification built in the platform.  |
| Recruitment   | Ongoing           | Equality & Diversity questionnaire has been added to the recruitment process and we can report at application, selection and recruitment stage.  | This will continue annually.  |
| Recruitment   | Ongoing into 2024 | Commitment commenced in 2023 but rolls into 2024. This will be our over-arching mission in 2024 with 3 main elements to this (see below), focusing on our top 5 suppliers (in terms of spend) in the first instance. |   |



# Thank you

Helping Retailers and Brands Sell More  
[deeset.co.uk](https://deeset.co.uk)