



Modern Slavery

Statement 2025

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Modern Slavery Statement 2025

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 2025

Introduction

About Us

We are a leading provider of retail solutions, products, and services, supporting a diverse range of retailers and brands. Retail Solutions (Holdings) Ltd heads our group of companies, which includes Dee Set Confectionery, Dee Set Logistics, Tactical Solutions, and White Hinge. With an annual turnover exceeding £100 million and a workforce of over 3,200 employees, we are proud of our scale and impact across the retail sector.

Our Commitment to Ethical Practices

At Dee Set, we are firmly committed to combating modern slavery and human trafficking in all forms. We understand that these crimes are often hidden, with victims facing significant barriers to seeking help. That's why we are dedicated to acting with integrity and transparency in all our business dealings. We have implemented robust systems and controls to ensure that forced labour and exploitation have no place in our operations or supply chains

Product Services



Retail
Merchandising



Distribution



Fulfilment



eCommerce
(White Hinge)



IT / Data
Solutions

Nicole Brittain
President, Acosta Group Europe

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 is our trusted partner, supporting our HR operations through the iTrent system



Our partnership with PageUp enhances our ability to attract and recruit the right people



Sapia empowers us to identify and recruit top talent through smart, data-driven insights.



Our collaboration with Thrive provides us with a leading e-learning platform—supporting both mandatory training and shared learning across the organisation



With Blink, we've created a seamless two-way communication channel that connects our colleagues in the field with those in support offices—building a real sense of community across the organisation.



Stream is our dedicated financial wellbeing platform, giving colleagues more control over their finances and the flexibility to manage their earnings in a way that works for them



Section 04

Product & Supply

Summary

- Dee Set act as an intermediary for the consolidation and distribution of products into one major retailer - Asda.
- Dee Set provide consolidation and distribution of POS into Sainsbury's, Morrison's and Boots.
- 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 colleagues within the supply chain division have completed the updated Modern Slavery online training module.

Consolidated Supply Chain

- Dee Set's top 10 suppliers account for approximately 56% of the supplier purchases in 2025.
- In 2025, Dee Set initially planned to assess its top 10 suppliers. However, following discussions with retail partners, it was determined that this assessment was not required under the current service model due to the consolidation approach
- Work commenced on developing a supplier Code of Conduct to strengthen expectations around ethical trading, labour standards and modern slavery compliance across the supply chain division. Implementation and communication to suppliers will be completed during 2026.



Section 04

Product & Supply

— Import Supply Chain (Far East) —

Through 2025 worked with one core supplier based in the Far East, with stock being imported through our primary partner, “On-Time.”

On 22nd August 2025, “On-Time” underwent a semi-announced Sedex 4-Pillar audit, covering Labour Standards, Health & Safety, Environmental Practices, and Business Ethics. The audit identified two corrective actions. Throughout 2026, we are continuing to collaborate with “On-Time” to address these areas, including exploring opportunities such as improved long-term planning to help balance production demands.

Dee Set also remains committed to providing all component suppliers, by issuing for signing, our bilingual ethical standards, aligned with the principles of the ETI Base Code:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are upheld
- Safe and hygienic working conditions are maintained
- Child labour is strictly prohibited
- Wages paid meet or exceed living wage standards
- Working hours are kept within reasonable limits
- Discrimination of any kind is not tolerated
- Stable and regular employment is ensured
- Harsh or inhumane treatment is not permitted

“On-Time” will be re-audited in 2026

Labour Providers

Agencies

We have identified the use of external agencies as a relatively high-risk area and have conducted a thorough analysis of those engaged to supplement our internal labour pool. As a result of this continuous review, our agencies remain stable and consistent at 4

Given the diverse nature of our Group and the wide range of skills and roles required, we believe that maintaining relationships with four agencies remains appropriate and proportionate to our operational needs.

Agencies we use:



ProActive Personnel Ltd



Polly Recruitment Ltd



KPI Recruiting Ltd



Blink Recruitment



Section 06

Our Policies

— Slavery & Human Trafficking —

Summary

We are dedicated to maintaining robust processes that prevent modern slavery and human trafficking within our operations and supply chains. In alignment with our core values of ethical conduct and integrity in all business relationships, we have a Modern Slavery Policy, complementing the existing policies outlined below.

These include:



Equality & Diversity



Anti-Bribery & Corruption



Disciplinary & Grievance



Gifts & Hospitality



Right to Work



Bullying & Harassment



Working Time Directive



Corporate Social Responsibility



Flexible Working



Whistleblowing



Section 07

Due Diligence

— Audit and Due Diligence —

Agency Engagement and Compliance

- Distributed our Minimum Standards for Labour Providers declaration to all partner agencies.
- Required each agency to complete and return the declaration to confirm alignment with our standards.

Modern Slavery Monitoring

- Implemented a quarterly review process to identify potential indicators of modern slavery. We now have historical data for auditing
- Checks include:
 - Duplicate email addresses
 - Shared phone numbers
 - Reused bank accounts
 - Common home addresses

Awareness and Internal Communication

- Raised awareness among warehouse staff through multilingual communications.
- Posters and materials placed in communal areas around our Head Office to ensure visibility and understanding.

Mandatory Training

- Training is mandatory for all relevant staff to ensure awareness and compliance with modern slavery policies.



Section 08

Training & Awareness

Summary

Each year, from **January to March**, our Learning & Development activity places a strong focus on Modern Slavery awareness. During this period, we launch new and updated learning content through **Thrive**, ensuring colleagues have access to relevant, engaging, and up-to-date training materials.

As part of our **induction pathways**, all new starters are required to complete **Modern Slavery and Bribery & Corruption** training. This ensures colleagues understand their responsibilities and our commitment to ethical business practices from the very beginning of their employment.

In addition to mandatory training, our Learning Management System, **Thrive**, provides a comprehensive library of resources, including e-learning modules, articles, videos, and guidance materials designed to further enhance awareness and understanding of these important topics.

2025 Compliance Stats

Business Unit	Compliance Rate	Year-on-Year Change
Dee Set Group	99%	+1%
Tactical Solutions	98%	+2%
White Hinge	100%	+0%

These figures represent a significant improvement over 2025, reflecting strong engagement across the business.

Ongoing Monitoring:
We report compliance monthly and share league tables with each business area to maintain momentum and drive continuous improvement in our Modern Slavery initiative.



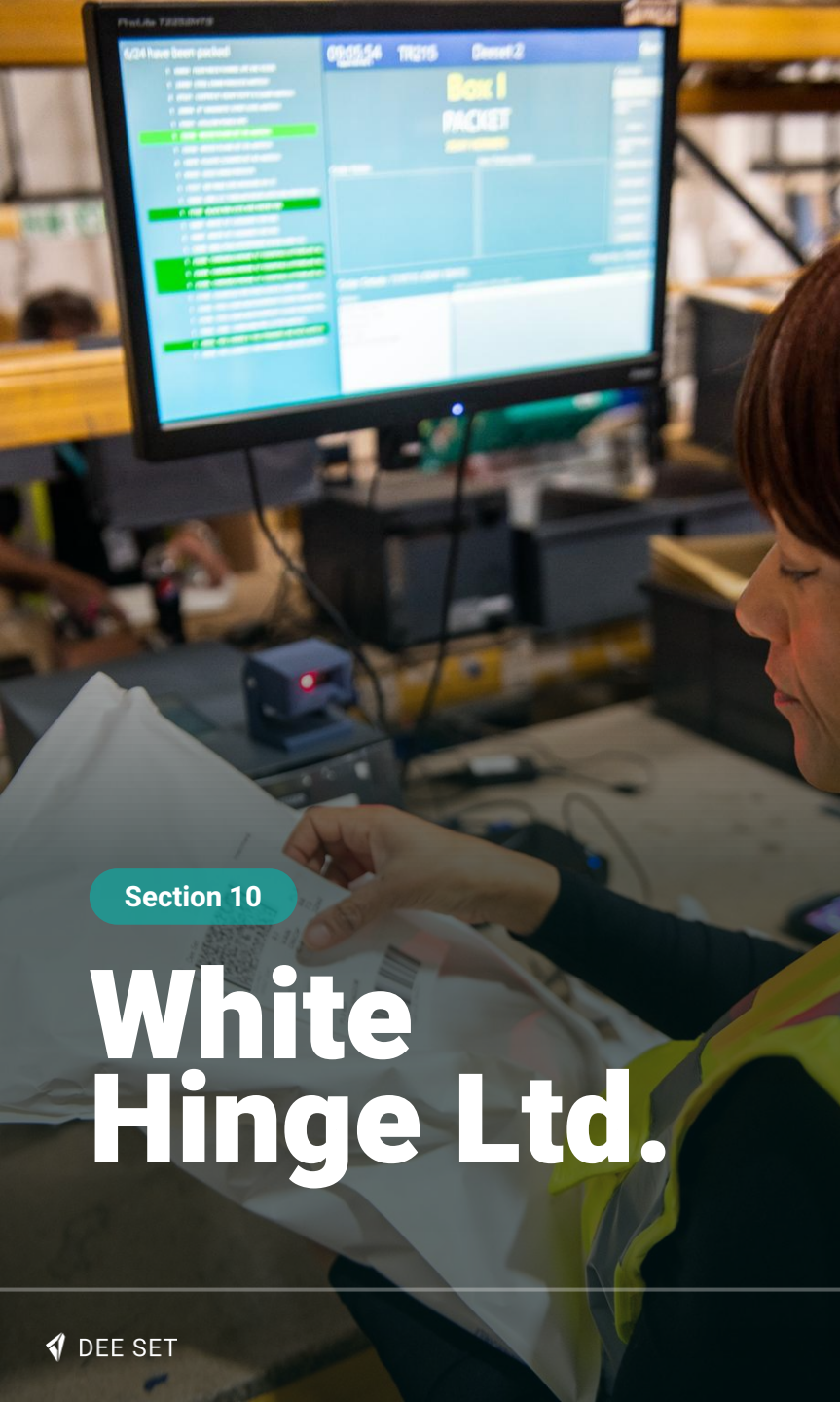
Section 09

Modern Slavery

— Performance Indicators —

We use the following methods to assess the effectiveness of our efforts in preventing modern slavery and human trafficking within our business operations:

- **Exit Interviews and Surveys:** We monitor reasons why colleagues leave the business through exit interviews and post-employment surveys, now conducted via both our HR system, MHR iTrent and HR Business Partners
- **Targeted Training:** Our onsite security team at the Distribution Centre receives additional training to help them recognise potential signs of modern slavery and understand how to report any concerns or observations.
- **Whistleblowing Helpline:** We provide a confidential whistleblowing helpline that allows colleagues to raise concerns anonymously if they wish. The details are included in our Whistleblowing policy.
- **Stakeholder Engagement:** We maintain regular communication and direct contact with our customers and suppliers to ensure they understand and comply with our expectations regarding modern slavery.
- **Data Monitoring:** We conduct monthly analysis of colleague data to identify unusual patterns, such as multiple individuals registered at the same address or repeated use of the same mobile number.



Section 10

White Hinge Ltd.

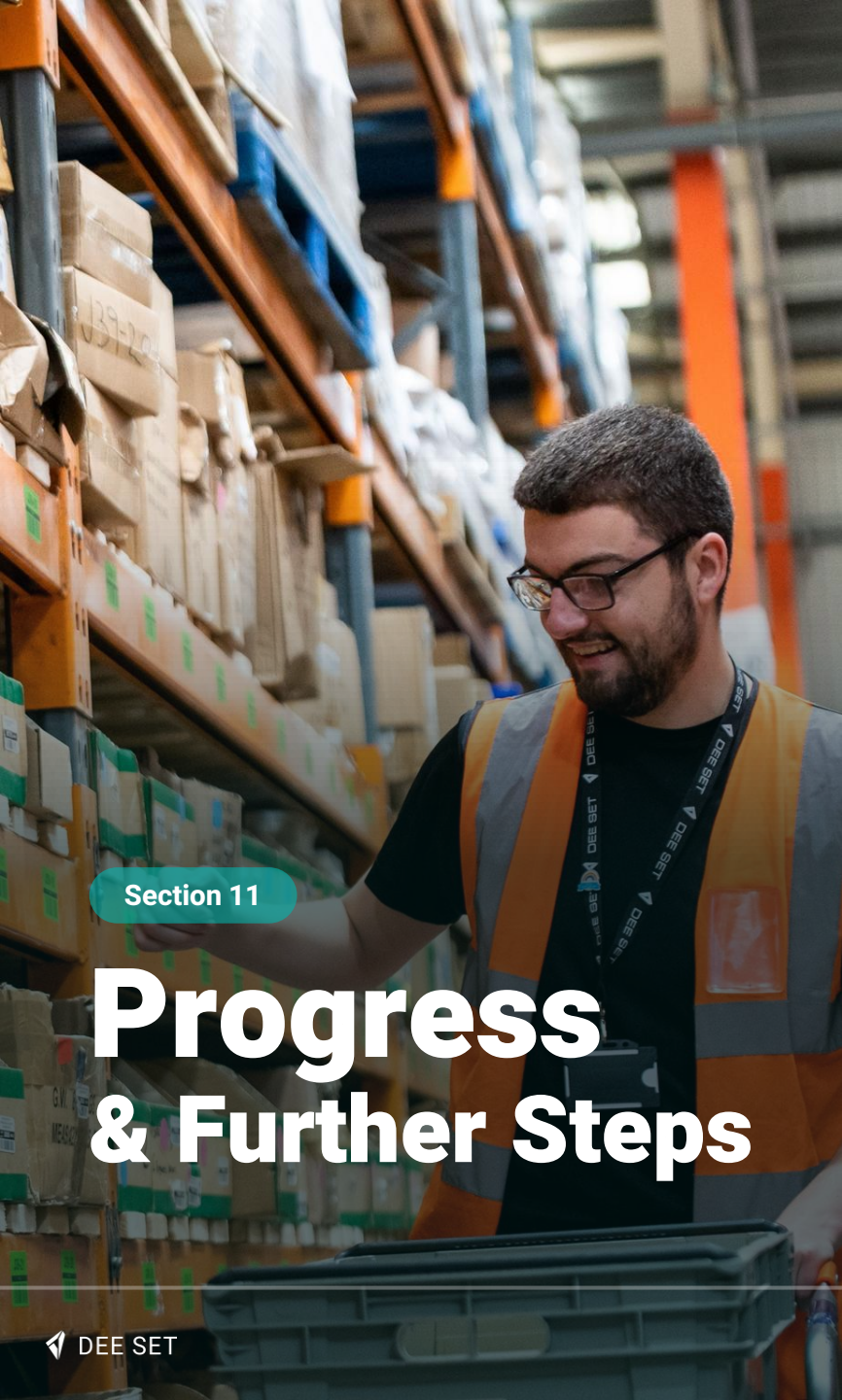
Statement

At **White Hinge**, we are firmly committed to maintaining the highest standards of ethical conduct and social responsibility across all areas of our business. As part of this commitment, we categorically oppose all forms of slavery, forced labour, and human trafficking. We fully acknowledge the severe human rights abuses associated with these practices and are dedicated to ensuring they have no presence in our operations or supply chain.

We actively engage with our suppliers to encourage ethical conduct, transparency, and responsible labour practices throughout our supply chain. By offering practical support and clear guidance, we aim to help them strengthen their labour standards and proactively manage any risks related to modern slavery.

We do not tolerate any form of modern slavery or forced labour within our business or supply chain. If a supplier is found to be involved in such unethical practices, we will take immediate action to end the relationship and pursue legal remedies where applicable.

We are committed to educating our employees about the risks of modern slavery and human trafficking. Through targeted training and awareness initiatives, we equip our colleagues with the knowledge and confidence to recognise warning signs and report any concerns or breaches of our modern slavery policy.



Section 11

Progress & Further Steps

— Supplier Diligence —

In June 2025, we expanded our due diligence to cover an additional 5 suppliers to collaborate on their modern slavery policies and understand what process/procedures are in place to mitigate:

01 MP Smith

02 Sure Health

03 Toolzone

04 Chase Hardware

05 Merriway

06 Amtech

07 Gem

08 Timco

09 Tallon

10 Era

Progress & Further Steps

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 31st July 2025. 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

● Ongoing
 ● Live
 ● Annual

Business Unit	Status	Comments	Additional Comments
Imports/ Supply Chain	●	Sedex Annual audit/ 2 non compliance / 1 x insurance/ 1 x overtime related	Overtime can be driven by short lead time requests, we conduct regular collaborative forecast meetings to help mitigate. This practice must be embraced by all customers, and supported by adequate staffing and aligned with "on-time" colleague requests, and local law.
People	●	Process of completing self audit to check for modern slavery concerns, ie duplicate email addresses, duplicate phone numbers etc., surnames and same addresses.	Process working well, we are producing quarterly reports to capture duplications.
People	●	Looking at agencies that we use to ensure we have captured all - in 2021 we worked with 27 agencies this has reduced to 4 in 2025 –	All signed our declaration.
People	●	Raised awareness in the Warehouse of modern slavery, various languages used to communicate throughout the team	Ongoing action
Supply	●	Sedex self assessment updated in 2024	Updated score 3.1 out of 5 (rated as good) improved by 0.6
Supply	●	Onboarding of AFB which supply a hair range for Asda, loss of 2 accounts in 2024, Morrisons and Incomm	
Supply	●	Code of conduct to be sent to all suppliers	
Recruitment	●	PageUp, Thrive and Sapia modern slavery statements to be gained	These have been obtained and saved.
Recruitment	●	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 training.
Recruitment	●	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.

Business Unit	Status	Comments	Additional Comments
Recruitment	●	RTW documents are all stored in one secure place - Online share codes are checked by the recruitment team (Investigate other platform) – Investigate Data Storage	Launched Feb 18th 2021 - Live and ongoing. Right to work documentation is securely stored on PageUp against the candidates record.
Recruitment	●	PageUp system ensures that we do not have duplicate email addresses for candidates and that they are genuine	Launched Feb 18th 2021 - Live and ongoing, PageUp has email verification built in the platform.
Recruitment	●	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	●	RTW refresher training attended by the recruitment team.	
Learning & Development	●	Figures for 2024: 2025 Modern slavery refresher training released on May 1st 2025.	2025 Completion Rates • Colleagues: 98.65% • Managers: 99.27% Modern Slavery, Bribery and Corruption training is incorporated into all induction pathways. Following their first year of employment, colleagues are automatically assigned annual refresher training covering Modern Slavery, Bribery and Corruption. Training pathways are tailored to the specific roles and responsibilities colleagues hold in supporting the prevention, identification and reporting of modern slavery risks within the business. The 2025 Modern Slavery refresher training was assigned to all colleagues and managers on 1 May 2025. Compliance data is shared with managers on a monthly basis, supported by automated weekly notifications from Thrive highlighting any overdue training. In addition, compliance reports are shared with HR Business Partners on a weekly basis to support ongoing monitoring and follow-up activities.
Security	●	Liaised with warehouse and included what to look out for and how to raise any suspicions in the Modern Slavery refresher 2025	
White Hinge	●	Commitment commenced in 2023 but rolls into 2025 This will be our over-arching mission in 2025 with 3 main elements to this (see below), focusing on our top 5 suppliers (in terms of spend) in the first instance.	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.
White Hinge	●	Moves into 2025 as a main focus on this policy	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.



Thank you

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