

MODERN SLAVERY STATEMENT

This is the second Modern Slavery Statement prepared by the Uncle Bills Group Pty Ltd (ABN: 22 126 575 335) in compliance with the Modern Slavery Act 2018 (Cth).

Introduction

- This statement encapsulates the processes that the UBA Group has taken to mitigate the risks of modern slavery in our business and those we do business with.
- UBA engages in product sourcing, wholesale supply, design, logistics support, e-commerce delivery, and website development.
- We have sourcing, shipping, in-house design, compliance, and quality assurance teams to help bring affordable products to market.
- We manufacture products specifically for customers utilizing their brands or offer a variety of goods under one of our own recognised brands.
- We have offices and showrooms in Australia, New Zealand, the Philippines, and China, with local representatives in other markets including the UK, Canada, and the USA.
- Uncle Bills believes that Modern Slavery can only be ended if all parties involved collaborate to drive change.

Reporting Entity

The company structure has not changed since the last Modern Slavery Statement. The information is repeated below.

Uncle Bills Group Pty Ltd is the parent company for a group of companies that supply goods to various wholesalers and retailers in Australia, New Zealand, and many other customers globally.

- The group consists of
 - Uncle Bills (Australia) Pty Ltd (ABN: 12 110 447 731)
 - Uncle Bills Asia Pacific Pty Ltd (ABN: 60 617 385 734)
 - Uncle Bills (New Zealand) Ltd (ABN: 1769374)
 - Action Sports Equipment Pty Ltd (ABN: 70 122 978 330)

Structure

- Our Head Office is in Sydney, Australia and employs over 70 staff.
- We also have offices in:
 - Auckland, New Zealand
 - Manila, Philippines &
 - Ningbo, China

Operations and Supply Chains

- We supply numerous Australian and global retailers with stock under their own brands. We also supply numerous small to medium sized businesses with a large assortment of goods under our own brands or as unbranded stock.
- We specialise in furniture, electrical, seasonal, sporting, and general discount variety merchandise.
- Globally we have over 200 active business partners – including suppliers, logistics providers, retail and wholesale customers, and various service providers.
- Our business partners are based throughout Oceania, Asia, The Americas, and Europe.
- Uncle Bills is a wholesaler and importer of retail goods and has warehouses based in China and Australia.

- A major portion of our supply chain is made up of suppliers, production facilities, and agents based in China, in addition to other manufacturers in Vietnam, Pakistan, the United States, and India.
- Additionally, we also have several local service providers and requisite suppliers in Australia and New Zealand.

We are developing an ethical sourcing framework that not only encompasses tackling modern slavery, but also guides us in ethical sourcing and searching for sustainable product options. As such, we are committed to conducting business responsibly and ethically and to ensure that all aspects of our businesses, including our supply chains, are free from any form of slavery. We are committed to implementing effective systems and controls to ensure that it does not take place within our own business or through any of our supply chains. 🍌

Risks of Modern Slavery

The key risk of modern slavery remains the same as recognized in our previous statement. Therefore, the UBA Group continued its focus on tackling modern slavery in overseas production sites. The main modern slavery issues identified as major concerns were forced labour, child labour, and excessive hours by home workers. Other forms of slavery exist (such as forced marriage), yet these are considered lower risks in our current supply chain.

The UBA Group domestic employment structure lowers the risk of modern slavery in our direct teams. The UBA Group directly employs staff in its New Zealand and Australian offices.

Our local service and requisite providers in Australia and New Zealand, are primarily concentrated in areas of supply that include recruitment, security, cleaning, and transportation. For now, as this is conducted in Australia and a New Zealand this is considered low risk in terms of modern slavery.

Our structure for contracting staff in both the Philippines and China has not changed in the last reporting period. With both our Philippine employment contractor and our sister company based in China we have developed a responsible and accountable working relationship. This is also considered low risk.

We will build on our preliminary steps in addressing modern slavery in our supply chain, and we will continue to address the highest-risk suppliers. Our principal manufacturing sources are located in China, and we will continue to work with them to mitigate the risks of modern slavery, either directly or indirectly through trusted third parties.

Risk Management – Actions we have taken

The UBA Group has worked with major retailers in both Australia and globally to audit manufacturers, with an eye to monitor and inspect worker conditions, worker safety and to ensure that all workers are hired appropriately under local laws and are not subjected to slave like conditions. The UBA Group works with factories on any non-conformances found. This collaborative approach ensures that conditions are improved.

We have continued to implement company training in ethical sourcing with an emphasis on understanding modern slavery and the risks within our supply chains. Our intention remains to educate, raise awareness, and set expectations in mitigating modern slavery risks throughout all branches of the corporate group.

The UBA Group has expanded its Supplier Corporate Responsibility Agreement Pack and has further developed its policies, since the last statement, and will now properly execute a plan to ensure that all high-risk business partners have received, read, acknowledged, and signed that they will embrace our policies on ethical and sustainable sourcing. The policies, as previously highlighted, outline our expectations, provide contacts for support, and demonstrate our approach to these serious issues. These policies will be produced as pack include:

- Ethical Sourcing Policy (incorporating Modern Slavery)
- Homeworker Policy
- Compliance Crisis Management Policy
- APCO
- Whistleblowing Policy &
- Our Employee Code of Conduct

These policies, in conjunction with assistance from our dedicated corporate responsibility team in China, will assist in educating and empowering our partners in ensuring all workers are treated fairly, with respect and with dignity. Our team in China visited numerous factories throughout the year providing guidance where appropriate.

We are continuing members of SEDEX, Amfori BSCI, BEPI and are FSC accredited. We have also recently signed onto APCO with the aim of developing more sustainable packaging.

In utilising more factories that are BSCI or SEDEX audited and internally approved we help improve social performance, and lower the risk of modern slavery, in our supply chain. We have continuously sourced goods from approved factories for customers locally and globally and will continue to do so.

Effectiveness of Risk Management

The UBA Group is still committed to ensuring that the steps we take will be effective and serve to build a system that will continuously improve risk identification and risk minimisation.

Continuous training, new staff inductions and an updated Induction booklet ensure that staff are aware of the risks of modern slavery in all facets of doing business. The Induction booklet encapsulates the UBA Group's minimum expectations in relation to human rights, legal entitlements and respect for team members and all individuals.

Working with suppliers to rectify audit non-conformances to protect essential worker freedoms and to require re-audits annually contributes to our supply point's continuous improvement and helps safeguard basic human rights.

Membership to BSCI and SEDEX allows us to use tools on their platforms to monitor the performance of production facilities more effectively.

China staff site visits and pre audit assistance give us a clearer view of conditions and improvements required.

The policy framework we have further developed is ready to properly implement and track for commitment from high-risk suppliers.

Supplementing last year, we have continuously worked with several supply points to help improve social standards at production points.

Consultation

This statement was approved by the boards of each of the four reporting entities covered by this statement. The board of Uncle Bills Group Pty Ltd approved this statement December 2021.



Kim Mossman
Director: Uncle Bills (Australia) Pty Ltd
22 December 2021



Kim Mossman
Director: Uncle Bills Asia Pacific Pty Ltd
22 December 2021



Kim Mossman
Director: Uncle Bills (New Zealand) Pty Ltd
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