

Modern Slavery Statement

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

This report outlines The UBA Group Pty Ltd's commitment to identifying, assessing, and mitigating modern slavery risks across its operations and supply chains. It summarizes our structure, sourcing practices, risk assessment, actions taken, and continuous improvement initiatives.

Our approach reflects compliance with the Modern Slavery Act 2018 (Cth) and demonstrates our dedication to ethical sourcing and responsible business practices.

Reporting Entity

The UBA Group Pty Ltd (Uncle Bills) is the parent company for a group of companies that supply goods to various wholesalers and retailers in Australia, New Zealand, and 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 (CN: 1769374)
- Action Sports Equipment Pty Ltd (ABN: 70 122 978 330)
- We are currently setting up a new company based in the UK (UBUK Limited) and one in Germany (Uncle Bills Germany GmbH).

Structure

Our Head Office is in Sydney, Australia and employs over seventy staff.

We also have offices in:

- Manila, Philippines
- Shaoxing, China



Supply Chains and Operations

We purchase a wide range of products and are discount variety specialists. We have a core range of products that we sell and additionally offer specialist programs in an assortment of other product groups.

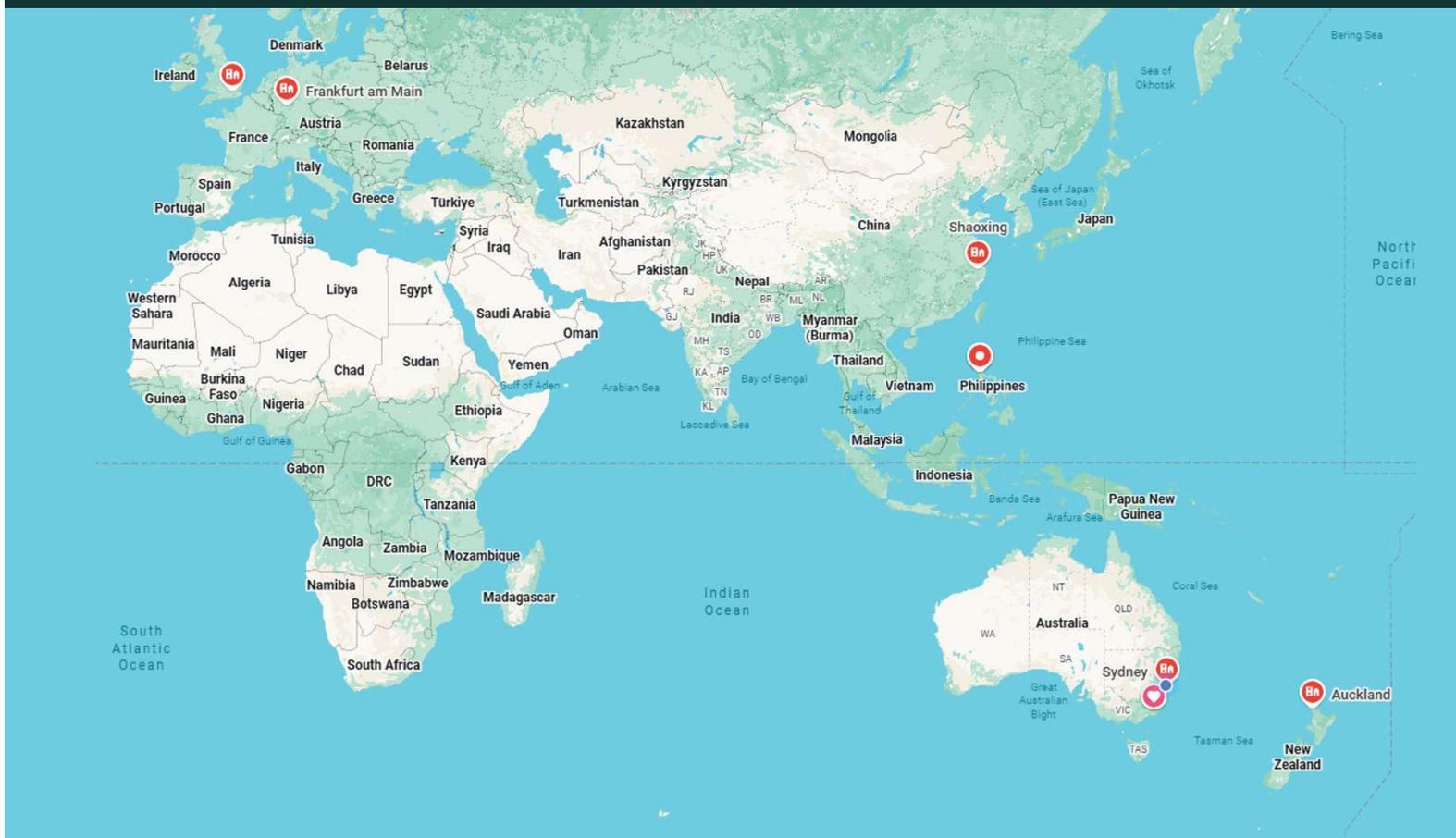
We source the majority of our items from China, but also purchase goods from Pakistan, India, America, Vietnam, Indonesia, Europe and the UK.

We own a number of trademarks locally and internationally. We sell both branded and unbranded products to our customer base. We also make goods to order for larger customers using their company owned brands.

Combining business partners who we sell too, or who provide us with goods, and or services we work with over two hundred businesses. We sell products to retailers, distributors and wholesalers, and purchase goods and or services from logistic service companies, products providers and various local and international service providers.

As a group we have warehouses based in China, the USA and Australia.

We regularly update our supplier policies and send these to our supplier base. We maintain a record in our database of suppliers that have received, signed and acknowledged our policies – agreeing that they will do business in an ethical manner.



Risks of Modern Slavery

As per previous years and statements we find there are four key factors which elevate the risk of modern slavery.

- Vulnerable populations
- High risk business models
- High risk categories
- High risk geographies

We recognise that the global supply chain, particularly in markets like China, Vietnam, Pakistan, and Thailand, inherently carries elevated risks of modern slavery, including concerns about forced or bonded labor and restrictions on the freedom of association. We are proactively addressing these challenges by working closely with our established, long-standing suppliers to implement robust, collaborative due diligence and effective risk mitigation strategies. We also recognise that risks associated with migrant labour and wage theft are particularly pronounced within local cleaning, security, and logistics industries.

Risk Management – Actions Taken

We have finalized a comprehensive Supplier Pack, consolidating key policies for our partners. The rollout is actively progressing, with both new and existing suppliers receiving the documentation, which they are required to review and formally acknowledge their understanding and agreement.

Our updated policy suite includes:

- The UBA Ethical Sourcing Policy
- The UBA Modern Slavery Supplier Policy
- The UBA Illegal Logging Policy
- The UBA Homeworker Policy
- The UBA Sustainable Packaging Policy

During overseas visits our buying teams are actively reinforcing our expectations regarding modern slavery compliance. To support these efforts, our China-based team is conducting regular supplier visits and collaborating with the Australian team to address and resolve Corrective Action Plans (CAPs) identified during ethical audits.

We are building upon our efforts from previous years and as committed members of Amfori and Sedex, we conduct regular Amfori BSCI and SMETA audits to address modern slavery concerns. These audits evaluate critical performance areas—including freedom of association, child labor, bonded labor, and protections for young workers—and we ensure all suppliers consistently meet high standards in these audit areas:

1. The rights of freedom of association;
2. No Child labour;
3. Special protection for young workers; &
4. No Bonded labour

Other performance areas we prioritise are

- Overall worker protections;
- Ethical business behaviour;
- Occupational health and safety and
- Addressing environmental concerns – focusing on packaging.

From these yearly audits, corrective action plans are developed and sent to our suppliers to assist them in understanding their modern slavery risks. This has enabled us to ensure they are showing continuous improvement. Regular auditing also fosters vigilance and compliance with local legislative requirements and expectations.

We assess the risk of modern slavery within our direct operations and local long-standing supplier relationships as low for the following reasons:

- **Operational Suppliers:** We have maintained long-term relationships (exceeding 10 years) with our core cleaning and security service providers, which mitigates risk in these areas.
- **Direct Employees:** Uncle Bills does not employ low-skilled foreign migrant workers directly or through recruiters, resulting in a low risk within our immediate workforce.
- **Philippines Office:** The Philippines has a lower risk rating in the Global Slavery Index compared to Australia. Furthermore, we mitigate risk by partnering with a reputable third party for all local hiring processes.

Our commitment to ethical practice is verified through independent audits. We maintain FSC certification, which involves annual audits conducted by Global Mark at our Australian office to ensure adherence to Core Labour Requirements. These requirements, which are integrated into our revised FSC manual, are verified through random, individual employee interviews and cover four critical areas:

1. Prohibition of child labour.
2. Elimination of forced and compulsory labour.
3. Non-discrimination in employment and occupation.
4. Respect for freedom of association and collective bargaining rights.

We continue to reinforce this commitment through ongoing training provided to all staff.

Effectiveness of Risk Management

In FY26, our strategy for continuous improvement is built upon leveraging data and insights gathered during previous reporting periods. By analyzing this information, we aim to refine our identification and understanding of potential modern slavery risks within our supply chains and assess the effectiveness of our current risk management approach. This includes enhancing internal capacity building and engaging external partners to ensure alignment with best practices.

We recognise the necessity of ongoing review and updating of our policies and procedures, enabling us to be proactive in identifying potential issues and responding swiftly if concerns arise.

Our Corporate Responsibility Team is central to this process, ensuring that factories meet or exceed required standards as demonstrated by audit results. Through regular re-audit cycles and the development of Corrective Action Plans (CAPs), we ensure issues are addressed promptly and continuous improvement is maintained. This stance is designed to reduce modern slavery risks and promote long-term ethical practices.

The CAP process, a crucial post-audit phase within the Amfori BSCI and/or SMETA frameworks, drives ongoing

improvement in supplier performance. Audit reports highlight areas needing attention, and suppliers commit to implementing resolutions within specified timeframes.

This is not a one-time fix but part of an enduring commitment to better working conditions. In the last period, nearly 150 active overseas suppliers underwent ethical audits and engaged with us on rectifying identified concerns.

Our risk management strategy is further strengthened by our robust Whistleblower Policy. This ensures that any individual can report concerns anonymously and confidentially, safe from retaliation. We foster a culture of openness by guaranteeing that those who raise valid modern slavery concerns will face no sanctions.

Consultation

In the relevant reporting period, we consulted with the four entities in preparation of this modern slavery statement.

This statement was approved by the boards of each of the four entities covered by this statement. The board of The UBA Group Pty Ltd approved this statement 17th December 2025.

Kim Mossman

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Director: Uncle Bills (Australia) Pty Ltd
24th December 2025

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