

MODERN SLAVERY STATEMENT

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

In our fourth annual Modern Slavery Statement, we have been able to demonstrate progress across key areas of good practice, including monitoring and human rights risk assessment. We have observed that there is a significant global trend toward greater transparency, human rights related reporting requirements, and business accountability.

Reporting Entity

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

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 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 (CN: 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:
 - ▶ Manila, Philippines &
 - ▶ Ningbo, China

Supply Chains and Operations

- ▶ We remain determined to build a culture of continuous training and upskilling of our employees. Uncle Bills continues to be committed to integrating ethical, responsible, and sustainable practices across the business and supply chain. We select our factories and partners with their social, ethical and sustainability commitments in mind and continue to conduct regular audits to ensure compliance is maintained. We are a member of Sedex, BSCI - organisations that specialise in ethical auditing.
- ▶ The specialist categories we supply include Christmas, Halloween, furniture, electrical, sporting, and everyday essentials.
- ▶ We offer a wide selection of unbranded, or UBA Group branded goods to smaller businesses in a variety of ways to help maximise their potential and growth. Additionally, we provide a variety of Australian and global retailers with product under their own brands.
- ▶ Globally we still have over 200 active business partners – including suppliers, logistics providers, retail and wholesale customers, and various service providers.
- ▶ These partners are based throughout Oceania, Asia, America, and Europe.
- ▶ We have offices and showrooms in Australia, Philippines, and China, with local representatives in other markets including New Zealand, the UK, Canada, and the USA.
- ▶ As a group we have warehouses based in China and Australia.
- ▶ The majority of our goods are produced and exported from China. Additionally, we source goods from manufacturers in Vietnam, Pakistan, America, and India.
- ▶ Additionally, we also have several local service providers and requisite suppliers in Australia and New Zealand.

We select suppliers, production facilities and agents who certify that they are committed to the health and safety of their workers. We conduct internal audits to ensure they do not use forced labour or materials, or goods produced by forced labour. We implement supplier programs that ensure no materials used in our products come from sources that commit human rights violations.

Suppliers have been sent our Uncle Bills Group Supplier Pack that contain our various company policies. They must read and acknowledge that they have read, understand and will adhere to these policies. Included within our company policies are our Ethical Sourcing Policy, and our Modern Slavery Supplier Policy. Key elements of our policies are:

- ▶ Suppliers must treat all employees with respect and not use coercion or harassment.
- ▶ Suppliers agree not to engage in any form of human trafficking or slavery including not using forced or involuntary labour or any type of illegal child labour.
- ▶ Suppliers shall not engage in acts of bribery and or corruption.
- ▶ Suppliers should comply with all applicable wage and local labour laws and regulations including those relating to minimum wages and overtime hours.

In addition, the use of the Amfori Sustainability Platform enables and supports co-operation on risk management within our supply chains by using such tools as the Supply Chain Mapping tool and the Amfori Insights data reporting tool.

Risks of Modern Slavery

Uncle Bills continues to focus our efforts on preventing modern slavery in the overseas production of items we procure. Forced labour, child labour, and excessive working hours endured by factory or home workers are the main risks we have identified in our supply chains. Other risks exist but are deemed lower risks in our supply chain.

To reduce the risk of modern slavery in our overseas production facilities we communicate expectations via our Supplier Pack which covers our ethical sourcing, modern slavery, homeworkers, and illegal logging policies. We also have a team in China who regularly visit the production facilities and conduct on the spot internal audits.

We also use global data sourced from Amfori insights – which has a tool, the new ESG Risk Compass, that allows us to filter by social and governance risk indicators to help us with our due diligence review of suppliers in various countries.

We have reviewed our structure for contracting staff in both the Philippines and China and have left this unchanged as we have developed a responsible and accountable working relationship with both entities, and this is also considered low risk.

The UBA Group directly employs staff in its Australian office and uses reputable employment agencies to source labour. This arrangement lowers the risk of modern slavery in our direct teams.

As per our previous statements our local service and requisite providers in Australia, are mainly concentrated in areas of supply that include recruitment, security, cleaning, and transportation. This is conducted in Australia and is considered low risk in terms of modern slavery.

When considering new suppliers, The UBA group conducts due diligence to determine suitability and also regularly reviews its existing suppliers through internal audits and third-party audits. We will continue to do this.

Risk Management – Actions Taken

All our policies have been reviewed and updated where needed. The UBA Group is committed to its policies in relation to ethical sourcing (including the prevention of modern slavery), homeworkers in the supply chain, sustainability, and crisis management. We continue to provide staff training in relation to all our policies as this helps to educate, raise awareness, and set expectations in mitigating modern slavery risks throughout all branches of the corporate group.

All new employees are informed about Modern Slavery, what it entails and the risks. All employees are updated yearly with a copy of our new Modern Slavery Statement.

The UBA Group works with our customers and suppliers in addressing and rectifying issues found through annual auditing of production sites. We have found that working with our partners to improve conditions is a productive approach. Audits help to review worker conditions, worker safety and to guarantee that all workers are hired appropriately under local laws and are not subjected to slave like conditions. We summarise and forward non-conformances to our production

facilities and follow up to ensure these are closed.

We have continued being members of SEDEX, Amfori BSCI, BEPI, APCO and are FSC accredited. These are bodies that assist with ethical and sustainable sourcing of products. When joining Amfori we signed an agreement to meet minimum standards on human rights protection through supplier due diligence and to ensure environmental protections as set out in the BSCI Code of Conduct are met. The UBA Group takes this very seriously.

External ethical audits are an important tool as they are impartial and lower the risk of modern slavery in our supply chain. External ethical audits enable us to continually review, engage, and hold production facilities accountable. Our goal is to carry out social compliance audits on 100 percent of our suppliers.

BSCI, SEDEX and internal audits are an effective way of assessing and addressing risk. The various audits specify and evaluate factories in various performance areas. These reviews help identify practices that could lead to or indicate modern slavery. A remediation process is in place to assist suppliers in addressing any negative audit findings. The process is a collaborative approach, based on continuous improvement of conditions, between The UBA Group and suppliers. If a supplier was found to be engaging in forms of Modern Slavery was detected, A Zero Tolerance alert would be raised and reported. In the situation where a Zero Tolerance is detected, the UB Group would work with the Audit body and its membership team to rectify and put in place a plan to address the Zero Tolerance.

Our Corporate Responsibility team based in China, conduct internal audits and engage with production facilities to establish a positive culture around human rights. Having a team based in China enables us to have a greater insight into our production facilities practices.

Our Supplier pack continues to be rolled out to new Suppliers that come on board. The Supplier Pack is a resource provided to ensure our suppliers fully understand our social compliance requirements and to assist them with proactively managing human rights within their factories.

Effectiveness of Risk Management

We partner with organisations like BSCI and SEDEX, as they are very experienced at monitoring and addressing human rights risks in the supply chain and have audit systems in place around the globe. Both Amfori and SEDEX conduct audits and follow up audits to assess the effectiveness of Continuous Improvement Plans. These processes allow us to determine the risks of modern slavery in our supply chain. The individual Performance Area ratings reviewed in audits, assess risks in multiple areas of social compliance and help us to identify high risk suppliers.

Auditing and yearly re-auditing of suppliers and the subsequent highlighting and correction of non-conformances, allows the UBA Group to work with suppliers who are actively trying to improve and protect vulnerable worker's rights.

The UBA Group continues to be committed to ensuring we improve risk identification and risk minimisation.

All UBA Group employees are aware of the risks of modern slavery through training, new staff inductions, and are all provided with a copy of the UBA Group Induction Booklet. The Induction booklet incorporates the UBA Group's

minimum expectations in relation to human rights, legal entitlements and respect for team members and all individuals. The induction booklet includes a Whistleblowing policy, our Discrimination and Harassment policy and addresses Anti-Social Behaviour and Bullying. We hold our employees accountable under our Code of Conduct and therefore each employee is required to sign that they understand and agree to the policies in our induction booklet.

As a part of our FSC membership, audits are conducted yearly by Global Mark (our third party auditor) at our office to ensure that we are adhering to Core Labour requirements. Employees are randomly selected and interviewed individually to confirm these requirements are being upheld.

Consultation

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

This statement was approved by the boards of each of the four reporting entities covered by this statement.

The board of The UBA Group Pty Ltd approved this statement 19 December 2023.



Kim Mossman

Director: Uncle Bills (Australia) Pty Ltd



Kim Mossman

Director: Uncle Bills Asia Pacific Pty Ltd



Kim Mossman

Director: Uncle Bills (New Zealand) Ltd



Kim Mossman

Director: Action Sports Equipment Pty Ltd

19 December 2023