

Dats Pty Ltd

This modern slavery statement, pursuant to the Modern Slavery Act 2018 (Cth), describes the risks of modern slavery in the operations and supply chains of Dats Pty Ltd ABN 26 001 733 697 ("**Dats**"). It includes information about actions taken to address those risks for the reporting period 1 July 2021 – 31 June 2022 (FY22).

Dats is a privately owned business that develops and supplies a range of consumer goods to retailers in Australia and New Zealand.

Dats maintains a zero tolerance for any form of modern slavery, including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment for labour or services, and the worst forms of child labour.



Our structure, operations and supply chain

Dats Pty Ltd is an Australian privately owned business headquartered in Sydney, Australia and employs over 90 people.

Dats is an importer and wholesaler of household consumer goods to retailers in Australia and New Zealand. Dats supplies a range of products including: stationery, diaries, Christmas decorations, festive lighting, pet needs, household cleaning and storage, kitchenware, hardware, garden, toys, luggage and travel goods. Dats markets its product under various brand names including: Lytworx, Chompers, DATS, Stash n Store, Zozee Toys, Chef's Companion, Garden Blitz, Mighty and Zilch.





We partner with over 170 suppliers and agents to manufacture our products, and though we do not own or operate any manufacturing facilities, our goal is to develop long-term business relationships.

The majority of our products are manufactured overseas, with a high proportion of these products originating from supply chains based in Asia. A small proportion of products are manufactured in Australia.

We accept that the supply chains to manufacture our products are complex and include multiple businesses from raw materials through to finished products. Our strongest relationship is with the suppliers, agents and manufacturing facilities at the final stage of the supply chain and as such is where our main focus is on addressing modern slavery risks.

Dats also procures a range of services in connection with its business operations at its Head Office and Distribution Centres including freight distribution and warehousing, cleaning services and IT technical support.

Risks of modern slavery practices in our operations and supply chains

We consider our operations and supply chain in Australia to be of low risk to modern slavery owing to our culture, policies and compliance with legislation.

We have focused our efforts where we have identified the highest risk of causing, contributing to, or be directly linked to modern slavery in our supply chains, and that is those based in Asia. Based on Sector and Industry Risks, Product and Services risks, Entity risks and Geographic risks, we believe forms of modern slavery such as forced labour and excessive work hours could possibly exist in those markets. Our ability to further review and investigate our supply chain has been impacted by COVID-19.

Our supply chains in Asia remain our focus in combating modern slavery, particularly the suppliers we deal with and the manufacturing facilities that they utilise to which we have no direct contractual relationship with. We are committed to assessing and addressing these risks as part of our due diligence as we have a zero tolerance for any form of modern slavery.





Our actions to assess and address modern slavery risks

Over the past year, Dats has implemented a Modern Slavey Policy, provided training for our Buying team and we continue to assess and address modern slavery risks as follows:

Policy:

Dats developed its first Modern Slavery Policy and it formalises our commitment to ensuring we give due consideration to the labour rights and obligations established by law and to end all forms of modern slavery within our operations.

Training:

We have provided training for our Buying team to ensure they understand modern slavery, its impact, risks, and to be able to identify it within our supply chain. This is important as the Buying team are the direct link to our supply chains in Asia. Educating our Buying team allows them to mitigate any possible modern slavery risks in our supply chain.

Supplier audits:

Dats undertakes visits to suppliers and their manufacturing facilities across our supply chain. This task is performed by the Buying team and is an important process as it provides first-hand experience into investigating and determining the risks of modern slavery in the supply chain. During the COVID-19 pandemic, the ability to travel to perform these visits was significantly impacted and as such, other processes such as reviewing existing ethical audit reports was utilised.

As a member of amfori Business Social Compliance Initiative (amfori BSCI) and Suppliers Ethical Data Exchange (Sedex), we have placed the importance with our suppliers on the use of manufacturing facilities that are independently ethically audited to the amfori BSCI or SMETA (Sedex Members Ethical Trade Audit) audit standards. As such, we have increased our use of manufacturing facilities audited to either of these ethical standards. These social monitoring programmes allow Dats to evaluate our manufacturing facilities and suppliers to understand working conditions in our supply chain. The audits enable us to assess our suppliers, monitor health and safety for workers, and highlight any modern slavery abuses such as child and forced labour.

As a Forest Stewardship Council (FSC) certificate holder, our business and FSC supply chain is independently audited to ensure we are meeting FSC's Core Labour requirements and national labour laws.

Due Diligence:

Prior to on boarding new suppliers and manufacturing facilities, their capability as a supplier is assessed including the potential for their supply chain to harbour modern slavery. Our Workplace Conditions policy applies to all our suppliers and Dats expects them and their supply chain to adhere to the principles and standards set out in the policy and implement suitable management systems and processes. It is expected that our suppliers communicate this policy within their business and to manufacturing facilities they utilise, so that they understand and comply with the policy.

Remediation:

Within our operation, our Grievance Policy outlines the process for raising and resolving grievances. All grievances are dealt with in a fairly and timely manner, to ensure it is resolved.

Assessing the effectiveness of our actions

Dats is committed to ensure that the actions we put in place are effective and add value. We assess our effectiveness by providing training sessions for our buying team and have open discussions about their experiences are dealing with suppliers in our supply chain. We launched a Modern Slavery Policy to formalise our commitment, and this is reviewed to ensure it is fit for purpose for our operations.

Our operations and FSC supply chain is independently audited to FSC's Core Labour requirements and national labour laws. Over the course of the year, all our suppliers who have been audited have meet or exceeded FSC requirements, meaning our FSC supply chain is at minimal risk of modern slavery.

As a member of BSCI and Sedex, we utilise these systems to manage audits and the nonconformances that are raised. We continue to work with manufacturing facilities to ensure these nonconformances are closed out in a timely manner.

Moving forward, we intend on building on this and our plan for the future is to map our supply chain for key suppliers in Asia and review their ethical audit reports.

Approval

This statement was approved by the board of Dats Pty Ltd on 28 September 2022.

Grant Thurkette

Grant Thurkettle Managing Director 28 September 2022

