



Modern Slavery Act Statement 2023

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1: Introduction from Director



“There’s simply no place for Modern Slavery within Xcel Bespoke or our supply chains.

A handwritten signature in black ink, appearing to read 'W. Gilholm'.

Wayne Gilholm
Chief Executive Officer

This statement was approved by the board of XCEL CONCEPTS PTY LTD on 23rd March 2023, and has been signed by Wayne Gilholm in his capacity as CEO.

As a global marketing procurement specialist, our people work hard to assist clients in designing, manufacturing, warehousing, and dispatching just about anything they require, to promote and market their businesses.

At Xcel Bespoke, we’re totally committed to bringing ingenuity, passion and creativity to all of our client’s projects, to ensure that they, and in turn their clients, achieve a truly memorable brand experience.

Whilst we’re totally client focused, we’re also painfully aware that modern slavery exists, that it’s a very serious global issue, and that it’s occurring in virtually every region and economy around the world.

Modern slavery is a crime and a violation of a person’s fundamental human rights. Modern slavery can take various forms including, slavery, servitude, forced and compulsory labour, debt bondage, forced marriage, human trafficking and even child labour, all of which have in common the deprivation of a person’s liberty by another to exploit for personal and/or commercial gain.

At Xcel Bespoke we continue to make concerted efforts to ensure that modern slavery, in all it's forms, is not taking place within our business or supply chains.

As a company, we remain committed to acting in accordance with The Modern Slavery Act 2018 as well as abiding by the UN Guiding Principles on Business and Human Rights. Our Modern Slavery Statement, which is outlined over page, describes what we at Xcel Bespoke are passionately committed to doing, to assess, identify, address and prevent modern slavery within our own business operations and those of our supply chains.

2: Internal Policy Development & Consultation

Xcel Concepts Pty Limited is wholly owned by Xcel Concepts Limited (UK). Throughout the development of this Voluntary Modern Slavery Statement, including the development of all our internal reporting policies, our key management personnel and company directors have worked together in close consultation to approve the content, in accordance with s.16.1 (f) of the Modern Slavery Act (Commonwealth) 2018



Furthermore, our directors and key operational management personnel have all completed internal Modern Slavery training and are actively involved in the review, impact and risk mitigation assessments of our internal and external audits and inspections.

3: Operational Supply Chain

Established in 2013, Xcel Bespoke is now a leading local and global marketing procurement specialist, operating out of offices located in Australia, UK, Holland, China, Bangladesh and Pakistan.

We're proud of our ability to provide clients with access to our vetted global supply chain solutions, which span and are designed to cater for a wide range of diverse industries.

At the heart of Xcel Bespoke is our ability to source, manufacture and distribute our clients marketing and promotional products throughout Europe, Asia, and Australasia using our trusted and vetted suppliers and strategic partners.

As a direct result of our operational reach, Xcel Bespoke acknowledges its responsibilities in relation to tackling modern slavery and remains committed to complying with the provisions of The Modern Slavery Act 2018.

Our organisation understands that this requires us to maintain constant reviews of both our internal practices and policies in relation to our own labour force, and most importantly, those of our supply chain partners.

Whilst we don't have a turnover above \$100 million p.a., which would require us to automatically abide by the Modern Slavery Act 2018, our commitment towards eradicating modern slavery remains resolute. Therefore, Xcel Bespoke has adopted a transparent, voluntary reporting position towards tackling modern slavery in our business and supply chains.



4: Supply Chains & Potential Exposures

In order for us to fulfil our operational activities, Xcel Bespoke utilises supply chains that are located in Australia, Europe, China, Bangladesh and Pakistan.

At each of our supply chain locations, Xcel Bespoke employs staff permanently as we consider our main exposure to the risk of modern slavery exists within the activities of our suppliers, and their suppliers who provide the base raw materials.

Beyond ensuring we maintain our own staff at the source of all our production, Xcel Bespoke also takes additional steps to ensure that all our procurement and production processes, within our business and those of any organisation that supplies goods and/or services to us, is carefully and regularly inspected to ensure they remain free of signs of modern slavery.



OUR GLOBAL OFFICES

5: Due Diligence & Supplier Adherence

Xcel Bespoke carries out an extensive due diligence process to ensure modern slavery does not exist in the organizations or the supply chains we work with.

As part of our own due diligence process, Xcel Bespoke takes the following steps to ensure that modern slavery is not taking place within our suppliers and supply chains:

- 1** We undertake regular reviews and site inspections of all suppliers, including formally contacting them in the event that the supplier is suspected of breaching any modern slavery guidelines.
- 2** We undertake employee working condition impact assessments on all our suppliers and their services.
- 3** We follow internal action plans that are designed to address the risk of modern slavery.
- 4** We ensure there are clear actions are taken by all our staff to embed a “zero-tolerance policy” towards modern slavery



Our factory and supplier audits are performed by independent and recognized third-party auditors in most regions.

Where this is not possible, we will have our own qualified in-house auditors conduct these inspections.

All audits are then reviewed by Xcel Bespoke’s senior management, and the suppliers are then graded based on the results of these audits.

6: Memberships & Third-Party Organisations

Xcel Bespoke holds an unwavering commitment towards quality, sustainability and the eradication of modern slavery which is why we proudly invest in, and remain committed to, maintaining the following levels of certification and memberships:



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7: Diversity, Equality and Inclusion

Diversity is an important part of who we are. Our vision is to ensure that all of our people can reach their full potential without having any unfair barriers put in their way.

Exclusion disproportionately impacts those experiencing oppression on the basis of their gender, race, class, religion or other identities.

We also welcome and encourage varied diversity characteristics including race, disability, gender, LGBTQI +, neurodiversity, religion, belief, and age within our team members and networks.

As a business, we believe that our diverse mix of backgrounds, skills and experiences drives new ideas, products, and services and provides us with a sustained competitive advantage.

