

NODERN SLAVERY VOLUNTARY STATEMENT

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2021-2022 2nd Statement

ethicalmerchco.com.au

INTRODUCTION

I am proud to release Ethical Merch Co's Modern Slavery Voluntary Statement, reflecting the second phase of our continuing journey and commitment to this important work.

Ethical production has been one of our core values since we began in the custom-made merchandise and apparel industry back in 2007. Since then, we have been educating ourselves, our clients, and the industry on the ethical sourcing journey. Striving to set a high standard so that our competitors in the market can begin to understand the importance of how the goods and services in our supply chain are managed and produced. One of the most effective purposes of our business name is raising awareness in the industry so that more become aware that the times are changing and the day has come that 'who' and 'how' are more important than the price tag attached.

To date, we have undertaken a thorough review of our policies and procedures as they relate to ethical sourcing, undergone an extensive search process of locating a factory that excels in ethical production standards, conducted training both internally and externally to raise awareness of the social and global challenges that necessitate ethical sourcing and identified opportunities for greater integration of ethical sourcing practices in our business processes and businesses' we have interacted with.

One of our goals is to become a key voice in promoting ethical production within the production industry and an advocate for the introduction of Modern Slavery legislation in Australia. We are also excited about the introduction of the Modern Slavery Act in NSW and commend the government for taking a step in the right direction, educating Australia on the important truths of modern slavery.

A large majority of people in this industry do care about human rights and are against any form of slavery, but simply don't know how or where to start when it comes to taking a stand against the issue. In order to create successful, sustainable, and ethical procedures - we know that physical actions must be partnered with a passionate heart for a world with no modern slavery.

To educate our clients on the heart behind the action, we provide the option to join us in partnering with charities like A21. A21 is a perfect example of another organisation that shares our heart in believing in a world without slavery. For 10 years now, they have rolled up their sleeves and set their feet to action. Why? Because in a single moment a number can turn into a name, a tragedy into a victory, and a belief into action. Raising awareness of A21's work, allows our clients to not only have the option to be educated but to help an organisation that physically frees slaves and disrupts the demand.

We want to do business differently. We recognise that to be fully successful, ethical sourcing commitments require the whole industry to work together, that's why we seek to work in partnership with like-minded organisations and businesses. We want to foster collaborative relationships with suppliers; train others on the basics of ethical sourcing including how human rights fit in; help our clients meet their own responsible sourcing targets, and take bold action above bold commitments. Aiming to one day have a completely ethical production line is a long road ahead and the process may not always be perfect, but we are committed to identifying, preventing, and working to remedy cases where people involved in our business operations are denied the right to live and work with dignity. We invite you to join us on this journey.

Nathan Kingston

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Sole Director CONCIERGE CONTACTS GROUP PTY LTD, Australia

THIS MODERN SLAVERY STATEMENT HAS BEEN APPROVED BY THE PRINCIPAL GOVERNING BODY FOR CONCIERGE CONTACTS GROUP PTY LTD.

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Nathan Kingston, Sole Director Concierge Contacts Group PTY LTD, Australia Approved on: 24/3/22



OUR MODERN SLAVERY STATEMENT

We are voluntarily reporting to outline our vision and journey of how we, as a business, can support ethical sourcing procedures throughout supply chains and all operations.

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STAND FOR SOMETHING

Our 5-year goal is to have the largest presence in the Australian market so that clients and competitors are competing on ethics and not just price. Price is the number one contributing factor that decides where the products are sourced from. This will stop suppliers in overseas countries from getting orders if they are not compliant. It's a long road ahead but we want to ensure people in our world aren't being exploited. We want to make a difference in the way the world sources its products. Many clients have no idea where their products are coming from and our aim is to change that. Some of our clients even use our standards in their own marketing materials to show their clients that they only align with ethical suppliers.

2. MISSION

The Global Slavery Index's 2018 report, published by the Walk Free Foundation, states that \$127.7 billion worth of garments at risk of including modern slavery in their supply chain are imported annually by G20 countries, a group of nations that account for 80 percent of world trade. These imports help underwrite a global economy that trapped 40.3 million people in modern slavery in 2016, 71 percent of whom were women. Our vision at Ethical Merch Co is simple - We want to disrupt the supply from factories that have unethical practices and create transparency for global businesses so they know where and how their products are being made.



RAISE THE INDUSTRY STANDARD

The way that we see it, if factories and suppliers are being turned down for business, they will eventually change the way that they operate. It starts with the buyer.

CHANGE THE WAY BUSINESSES THINK

Modern slavery is fed by a simple supply and demand structure. If we change the mindset of Australian businesses so that the deciding factors aren't so much about price, but about the lives attached - we change the demand. Ideally, If we all start changing the demand it will drastically affect the supply.



ERADICATE MODERN SLAVERY

Although it's a vision that seems ambitious, it's the reason we have taken on a business model that focuses on ethics. We genuinely believe that although it's a long road ahead - taking the right steps, we can live in a world without modern slavery.





CURRENT BUSINESS STRUCTURE

QUOTING (AND EDUCATING)

When a client introduces us to a brief, if they aren't yet familiar with how we operate, our first point of call is to bring up the topic of Modern Slavery. If our clients aren't already aware of the Modern Slavery Act, we educate them not only on the policy itself; but the importance of partnering on a journey to eradicate modern slavery.

Once the client can express some form of understanding about the way we source our products, we proceed to quote accordingly.

SOURCING (AND EDUCATING)

Depending on the client's request, we look into our current pool of factories and suppliers that would best suit their needs. Due to the vast spectrum of orders we produce, we have used the services of factories all over the globe.

Once we have matched a supplier that will best meet the client's order, we check their audit reports to make sure they are up to date. If we are unable to find a supplier that can produce the certificates, we will not supply the product.

Fortunately, we are able to educate the factories that are not complying and encourage them to move in the right direction, and let us know when they have done so. We continue to build relationships with our current factories; some of which have been working with us for over 6 years. Over that time we have been able to visit them, converse with workers & management, and inspect their working conditions.

FULFILLING ORDERS

The current production time frame varies depending on the product, but our rule of thumb for overseas manufacture is 5-7 weeks from confirmation of artwork. This estimate can vary, based on product availability, but we like to allow extra time to decrease any chance of modern slavery risks that may spawn from a tight deadline.

Once the order lands in our Sydney-based warehouse, it will then be sent out via courier.

DAY TO DAY OFFICE

Our warehouse and office are based in Castle Hill, Sydney. With a small team here on the ground, we are able to facilitate a fair and safe workplace, free of modern slavery.

OVERSEAS MANUFACTURE

We work with factories when manufacturing custom products. We have 3 key factories that we utilise for the majority of our orders. These factories all comply with Sedex Global by providing certifications for their production.

We have an agent on the ground in China, who knows our strict criteria when it comes to sourcing a product that is out of our 'Key Factories' capabilities. That criteria is to have Sedex Global membership, allowing us to inspect audit reports that have been undertaken and certifications to ensure the standards are met.

On the search for factories, we have come across many audits that have not met a high enough standard when it comes to reporting & certifications. Thankfully in these cases, we have been able to educate the factories on the modern slavery topic. One of these factories actually went on to produce certifications so that they could contend with the standard. That is our goal, educating and lifting up factories - to set a new standard, where the price isn't dictating the sale, but the ethical standard is.

OUR WHOLESALE SUPPLIERS

The minority of our business comes from local suppliers within Australia & New Zealand. Our local wholesale suppliers assist us in completing orders that total to a smaller quantity or for orders that are more basic in nature and where less customisation is involved. Ie; Pens, Mugs, Tote Bags, Generic uniforms, and other items of that nature.

When choosing our local suppliers, they must meet at the very least some of the following criteria:

- Acknowledge the issue of Modern Slavery and how it affects their supply chain.
- Provide audit reports, certificates, or any other relevant information regarding their supply chain.
- Provide examples of how they are combating the issue of Modern Slavery if applicable.

MODERN SLAVERY RISKS

1ST TIER OUR RISK CATEGORIES

Assessing our 1st Tier Risks is fairly easy, as we have a small local team and strict criteria when it comes to working with factories that comply with audits, certifications, and standards.

What we can acknowledge, is the risks of modern slavery in production and supply throughout higher tiers, that we currently cannot see, or where audits and visits have been unable to identify problem areas.

1ST TIER RISK AREAS

HIGH			
MEDIUM			
LOW		FULFILMENT	
QUOTING	SOURCING		DAY TO DAY

GLOBAL MANUFACTURING



FURTHER TIER RISK AREAS

Beyond tier 1 of our production, there are 3 clear points of risk (Exampled here for a cotton garment). This varies from product to product, and the number of stages involved in producing the product.

We are able to look further down the supply chain for our client's products when the order quantities are larger and it's within their budget.



ACTIONS TAKEN THIS YEAR (2021-2022)

AND SUBSIDIARY ENTITIES

PIONEERING BOARD INDUSTRY AWARENESS / PLAN



The Australasian Promotional Products Association (APPA) represents businesses that specialise in, tangible marketing through the supply, distribution, and decoration of promotional products.

As a leader in our industry, we were asked to help pioneer a strategy and plan to help all businesses within our APPA start to think about how they could look into and improve their supply chains.

SPEAKER @ LIVE WEBINAR: AUSTRALIAN BORDER FORCE TEAM ON MSA REPORTING AND CONTINUOUS IMPROVEMENT EXPECTATIONS



Director of Ethical Merch Co - Nathan Kingston was invited to be a guest speaker for this educational webinar.

Key Topics Covered Were:

- Modern Slavery Act update from The Australian Border Force
- · Key learnings from statements submitted so far
- Expectations for 2021/2022 reporting
- Working examples of best practice



INFORMED 365

CASE STUDY ON OUR BUSINESS BY SEDEX GLOBAL

Ethical Merch Co, a Sedex Global Member was asked to be the focus of a case study diving into practical ways that businesses can begin to look into their supply chains.



CERTIFICATE OF COMPLETION: KNOW SLAVERY ELEARNING MODULE

SUBMISSION OF INQUIRY INTO THE MODERN SLAVERY ACT 2018 AND ASSOCIATED MATTERS

To the NSW Legislative Council's Standing Committee on Social Issues.

DEVELOPED Q&A SUPPLIER QUESTIONAIRE

We actioned the creation of our own supplier questionnaire. The Q&A is designed to not only educate new suppliers on the topic of Modern Slavery but also gauge where there are on their journey.

COMPLIANCE QUESTIONNAIRE	3. Have you had a ly audits done on your facility in the last 12 months?
	Plassa answer by charaking spir, 'Yen' or Wis'
	Yes No H
	If the please speeders If we been rever the command organizations and attach their audit documentation to this questionnaire. Please also include the dails the audits wave conducted.
1. Do you know what modern slavery is? Please answer by checking box: "We' or "No"	
Yes No	
2. Are you aware of any modern slavery in your supply chain? Press answer by deading box. "Yer" or "By"	4. Do you have au-lits for your 2nd tier, 3rd tier, 4th tier suppliers. E.g If your manufacturing a tee shirt can you supply audits for the yarn,
Yes No	dying of garments, where the cotton is purchased, cotton fields etc. Place unsering checking so: "Ne" or Ne"
If Yes please specify	Ves 🗆 No 🗖
Please de net include any specific names of employees	If Yes please specify
	If you please life what fees/sections of your supply chain you can provide worth.

EDUCATIONAL APP

Ethical Merch Co has been designing and developing an educational mobile app with the intent to easily educate clients, suppliers, and the public on the topic of Modern Slavery.

Due to be completed in 2023.



ONGOING ACTIONS

As part of our 5-year plan, we as a company, have set in place an accountability map that indicates where we as a company need to improve. We do not claim to know exactly where all aspects of our products are produced, as there are only so many measures that can be taken into consideration given the wide array of products we can provide, but one day we hope to.



REACH FURTHER LEVELS

For example on a woven product: Currently, when inspecting the reports provided by suppliers & factories they will usually provide reports on top tiers such as the factories where the garments are being produced. Ideally, we want to be able to inspect all the way down to the cotton farm, although it's a long road ahead, we aspire to keep reaching further down.



INSPECT MORE SUPPLIERS

When we inspect new suppliers, we are only able to see so much with the reports provided. To improve our business, we aim to visit more factories, in addition to the factories we currently have relationships with, to physically inspect their production procedures.



STAFF KNOWLEDGE

We will continue to develop staff education on ethical sourcing and ethical production by attending appropriate conferences & educational events.



LIKE MINDED PARTNERS

We will continue to grow our partner base, with likeminded organisations that are equally passionate about making a stand against modern slavery. So far, we have become official partners of A21 - a non-forprofit organisation that fights modern slavery and human trafficking on the ground all over the globe.



Due to the changing conditions that the effects of Covid-19 as had on the globe, we have had to adapt our business model to ensure our process has not put a strain on our supply chains.



NOT MANUFACTURING IN HOT-SPOTS

One of our procedures is ensuring that the factories that we are utilising are not located in current hot spots, to do our part in not encouraging workers to be subject to unfair and unsafe working conditions and environments.



MANUFACTURING TIMES

We have adjusted our deadlines and production times and make this clear with our clients from the get-go, so that we are not placing extra pressure on workers.



ONLY SOURCING OVERSEAS IF CUSTOMER REQUEST

We have made the decision to only source overseas production as our last option once ethically sourced local product options have been exhausted. Due to the unknown environment overseas, while Covid is surging, it is harder and harder to determine how ethical the manufacturing process truly is. Attempting to keep our orders local in the interim, allows us to keep a closer eye on the process.

CHANGE

We have applied several procedures to the operation of our business to ensure we know where and how our orders are being fulfilled. Below are some of the key procedures we have put in place to support ethical production as best as we can and also educate our clients on the importance of the topic.





EDUCATE OUR CLIENTS ON THE MODERN SLAVERY ACT

If our clients aren't already aware of the Modern Slavery Act, we educate them not only on the policy itself; but the importance of partnering on a journey to eradicate modern slavery.

CHOOSE SUPPLIER/FACTORY BASED OFF CLIENT'S ORDER

Depending on the client's request, we look into our current pool of factories and suppliers that would best suit their needs. Due to the vast spectrum of orders we produce, we have used the services of factories all over the globe.



FACTORY CHECKS

Once we have matched a supplier that will best meet the client's order, we check their audit reports to make sure they are up to date. If we are unable to find a supplier that can produce the certificates, we will not supply the product.

Fortunately, we are able to educate the factories that are not complying and encourage them to move in the right direction, and let us know when they have done so.

We continue to build relationships with our current factories; some of which have been working with us for over 13 years. Over that time we have been able to visit them, converse with workers & management, and inspect their working conditions.



OUR ALIGNMENT

THE TYPE OF ORGANISATIONS WITH WHICH WE ALIGN OURSELVES WITH, HAS ALWAYS BEEN A CRUCIAL PART OF OUR BUSINESS. WE BELIEVE IN PARTNERING WITH OTHERS WHO SHARE THE SAME BELIEFS AND PASSION FOR A WORLD WITHOUT MODERN SLAVERY.



21 21 A21 is a nonprofit organisation fueled by radical hope that human beings everywhere will be rescued from bondage and completely restored. They are the abolitionists of the 21st century. They work with you to free slaves, disrupt the demand, and bring the perpetrators to justice.

Compassion Australia is a Christian holistic child development and child advocacy organisation that works in partnership with local churches to foster the spiritual, economic, social, physical and emotional development of children living in extreme poverty in over 25 countries.





You'll find Salvos across Australia dedicated to sharing the love of Jesus through caring for people, creating faith pathways, building healthy communities and working for justice. Regardless of where they are or what they're doing, one thing always remains true: They're about giving hope.



2nd Statement



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