

# Modern Slavery STATEMENT

This is the fifth 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 fifth annual Modern Slavery Statement, we have reflected to our first modern slavery reporting period in FY20. We have learnt a lot, and these lessons have given us a greater understanding of potential risks within our supply chains.

## Reporting Entity

The company structure has remained the same since our first 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 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 have offices and showrooms in Australia, Philippines, and China, with local representatives in other markets including New Zealand, the UK, Canada, and the USA.
- Most of our goods are produced and exported from China. Additionally, we source goods from manufacturers in Vietnam, Pakistan, America, and India.
- 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 have over two hundred active business partners – including: product suppliers, logistics providers, retail and wholesale customers, and various service providers.
- As a group we have warehouses based in China and Australia.
- We 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.

## Risks of Modern Slavery

There are four key factors which elevate the risk of modern slavery.

1. Vulnerable populations
2. High risk business models
3. High risk categories
4. High risk geographies

The risk increases under circumstances where multiple high-risk factors co-exist. As we source from China, Vietnam, Pakistan and Thailand we have identified through Amfori insights the risk of bonded or forced labour, precarious employment and right to freedom of association is high to very high.

Locally in our Operational suppliers we have identified the following categories as high-risk areas – cleaning and security services and logistics and transport services. We acknowledge that modern slavery risks are inherent in these areas as risks can be associated with recruitment of migrant labour and underpayment of wages.

## Risk Management – Actions Taken

We acknowledge the risk of modern slavery is inherent in the overseas countries we source from. Given that many of the suppliers we use we have had long standing relationships with we have been able to prioritise due diligence and risk mitigation.

We are members of both Amfori and Sedex. By conducting Amfori BSCI and SMETA audits we address issues of modern slavery as the audits identify the following performance areas; In these four performance areas we ensure all suppliers score A.

- The rights of freedom of association
- Child labour
- Special protection for young workers
- Bonded labour

Other performance areas we prioritise are,

- Worker's involvement and protection
- Ethical business behaviour
- Occupational health and safety

Through 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.

Through auditing we can identify suppliers who do not show continuous improvement or those that are considered higher risk. For these suppliers' internal audits may also be performed.

Our buyers are travelling overseas more consistently now and are conducting more factory visits – this has not been done since before Covid. At these visits buyers are reiterating our expectations in relation to modern slavery.

We have continued rolling out our Supplier pack to new suppliers which involves them reading our policies and signing off that they understand and agree. Our supplier pack includes our Ethical sourcing policy, Modern slavery Supplier policy, Illegal logging policy, Homeworker policy and Sustainable packaging policy.

We consider the risk of modern slavery to be low with our operational suppliers, particularly in cleaning and security services, with whom we have maintained relationships for over 10 years.

Uncle Bills does not employ or hire low skilled foreign migrant workers directly or through recruiters. We consider that the risk of modern slavery in our direct team is low.

Our Philippines office we also consider the risk of modern slavery as low as the Philippines has a lower risk rating than Australia according to the Global Slavery Index.

We continue to be FSC certified where Global Mark (our third-party auditor) conducts yearly audits at our Australian office to ensure we are adhering to Core Labour Requirements. Employees are randomly selected and interviewed individually to confirm these requirements are being upheld. Our FSC manual has been revised and updated to reflect the core labour requirements. The four core labour requirements are:

- ▶ Not use child labour
- ▶ Eliminate all forms of forced and compulsory labour
- ▶ Ensure that there is no discrimination in employment and occupation
- ▶ Respect freedom of association and the effective right to collective bargaining.

We have continued training of new staff that join the company in the risks of modern slavery in both domestic and international suppliers.

## Effectiveness of Risk Management

In FY24, our primary focus was to enhance and build upon the information we gathered during previous reporting periods. By reviewing this data, we aimed to better identify and understand the potential risks of modern slavery within our supply chains. A critical part of this process was to assess the effectiveness of our risk management approach. This included capacity building efforts within our organization and active consultation with external partners to gain insights and ensure alignment with best practices.

We recognize the importance of continuous improvement, which is why we are committed to regularly reviewing and updating our policies and procedures. This ongoing process helps us stay proactive in identifying potential instances of modern slavery and enables us to respond swiftly if any concerns arise.

Our Corporate Responsibility Team plays a pivotal role in this process by ensuring that all factories within our supply chain meet or exceed the required standards, as reflected in audit results. Through the completion of re-audit cycles and the development of Corrective Action Plans (CAPs), we ensure that any issues identified during audits are addressed promptly, with continuous efforts to improve over time. This proactive approach is designed to reduce the risk of modern slavery occurring, while also promoting long-term ethical practices within our supply chain.

We also utilise Amfori Insights, a tool that offers detailed information, by country, about vulnerable workers within the workforce, gender representation, and migrant worker conditions. This platform provides valuable information that allows us to assess how our supply chain is performing in terms of monitoring, results, learning, and improvement. In addition to Amfori Insights, we utilize the Amfori ESG Risk Compass, which provides detailed risk assessments by country and category (e.g., governance, social, and environmental).

Another critical component of our risk management strategy is our Whistleblower Policy. This policy ensures that any individual within our organization can report concerns anonymously and confidentially, without fear of

retaliation. We make it clear that those who raise valid concerns regarding modern slavery will not face any sanctions or negative consequences for their actions, which encourages a culture of openness and accountability.

Lastly, we prioritize staff training to ensure that all office employees are equipped with the knowledge and skills to identify the risks of modern slavery. This training ensures that staff members understand the signs of modern slavery, know how to raise concerns, and are aware of the tools and procedures in place to address these issues effectively. By fostering a well-informed and vigilant workforce, we are better positioned to detect and mitigate any potential risks within our supply chains.

Through these various measures, we continue to strengthen our approach to managing modern slavery risks, ensuring that we uphold the highest ethical standards across our operations and supply chains.

# 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 10th December 2024.



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  
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10th December 2024

