

MODERN SLAVERY STATEMENT

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

Introduction

Since our last statement our main business functions have remained the same.

- This statement encapsulates the processes that The UBA Group has taken to mitigate the risks of modern slavery in our business and those we do business with.
- UBA engages in product sourcing, wholesale supply, design, logistics support, e-commerce delivery, and website development.
- We have sourcing, shipping, in-house design, compliance, and quality assurance teams to help bring affordable products to market.
- We manufacture products specifically for customers utilizing their brands or offer a variety of goods under one of our own recognised brands.
- 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.
- The UB Group believes that Modern Slavery can only be ended if all parties involved collaborate to drive change.

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

Since our last statement we have closed our office in Auckland New Zealand, although we are still represented by staff in New Zealand.

Supply Chains and Operations

- Uncle Bills has committed to integrating ethical, responsible and sustainable practices across the business and supply chain. We remain determined to build a culture of continuous training and upskilling of our employees. We select our factories and partners with their social, ethical and sustainability commitments in mind and have a system of regular audits to ensure ongoing compliance. We are a member of Sedex, BSCI - organisations that specialise in ethical auditing.
- 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.

- The specialist categories we supply include Christmas, Halloween, furniture, electrical, sporting, and everyday essentials.
- Since our last statement, 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.
- 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.

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

Our Strategic suppliers are required to adhere to our Ethical Sourcing Policy. We require that as a condition of doing business with us:

- 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 should comply with all applicable wage and local labour laws and regulations including those relating to minimum wages and overtime hours.
- Suppliers must treat all employees with respect and not use coercion or harassment.
- Suppliers shall not engage in acts of bribery and or corruption.

Our approach to modern slavery is incorporated into our broader ethical sourcing framework. This framework guides our approach in preventing modern slavery, as well as guiding us in ethical sourcing and searching for sustainable product options. We are dedicated to managing our businesses in an ethical manner, safeguarding our sourcing activities from involving any form of slavery.

Risks of Modern Slavery

The key risk of modern slavery remains the same as recognized in our previous statement. So, Uncle Bills will continue 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 mitigate the risk of modern slavery in our overseas production facilities we work closely with them to ensure they have robust management systems in place to address the risks on a regular and ongoing basis.

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.

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.

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

The UBA Group conducts due diligence when considering new suppliers and regularly reviews its existing suppliers. We will continue to do this.

Risk Management – Actions we have taken

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. Continuous staff training in relation to all our policies helps to educate, raise awareness, and set expectations in mitigating modern slavery risks throughout all branches of the corporate group.

The UBA Group collaborates with our suppliers in addressing and rectifying any issues found through annual auditing of production sites. 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 have found that working with our partners to improve conditions is a productive approach.

We have a dedicated corporate responsibility team based in China, who audits and engages with production facilities to establish a positive culture around human rights. Additionally, our 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 (we are continuing to roll this out).

We are members of SEDEX, Amfori BSCI, BEPI, APCO and are FSC accredited. These are bodies that assist with ethical and sustainable sourcing of products.

External ethical audits are impartial and lower the risk of modern slavery in our supply chain through continual review, constant engagement, and accountability. Our goal is to carry out social compliance audits on 100 percent of our suppliers.

BSCI, SEDEX and internal audits review concerns around forced labour, child labour, working hours, freedom of association and environmental, health and safety issues. Our audit program is built on continuous development and is a starting point for driving long term improvements in conditions for workers in our supply chain. We have an escalation process in place for high-risk violations.

Effectiveness of Risk Management

The UBA Group is still committed to ensuring that the steps we take will be effective and serve to build a system that will continuously improve risk identification and risk minimisation.

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.

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.

Membership to BSCI and SEDEX allows us to highlight high risk countries and production sites, and to work with production facilities in avoiding risks to safety and freedoms.

Commitment from high-risk suppliers to our policies will encourage them to work in a manner that lowers the risks of modern slavery occurring in our supply chain.

We will continue to work with our supply points to help improve social standards for all employees.

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 28 December 2022.

Kim Mossman
Director: Uncle Bills (Australia) Pty Ltd
28 December 2022



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28 December 2022



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