



# MODERN SLAVERY ACT

## TRANSPARENCY STATEMENT 2023

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The statement sets out the steps taken by UP Global Sourcing Holdings plc and UP Global Sourcing UK Ltd (Trading as Ultimate Products) to prevent modern slavery in its own business and supply chain for the financial year ending **31 July 2023**. In FY24, the PLC and UK company name will be updated to be aligned with our trading name, to Ultimate Products PLC and Ultimate Products UK Limited.

### **OVERVIEW & STRUCTURE**

Under our wider ESG strategy, we are committed to ensuring that we supply quality products that are sourced, manufactured, and supplied in a fair, ethical, and environmentally responsible way. We actively review this area of our business through our internal ESG structure, with modern slavery and general practices covered under the social (S) element.

As a PLC retail brand house that sources, develops, and distributes branded consumer goods within global channels we recognise that there are potential risks of modern slavery within our suppliers and supply chain partners, and we are committed to ensuring we fully understand these and shall work with our partners to mitigate them on a continued basis. This includes regular monitoring of our performance and setting key targets to achieve.

The organisation has offices in the UK, China, Hong Kong and France, Distribution Centres in the UK along with leased warehousing facilities in Europe. The core of our suppliers are based in the Far East and our external logistic partners operate internationally.

We will not tolerate any form of modern slavery nor knowingly work with any suppliers or logistic partners that are involved in any form of slavery, human trafficking or exploitation and we are satisfied that there is no evidence of any act of modern-day slavery within our supply chain this year.

### **RISK AND RESPONSIBILITY**

In May 2023, we introduced a **Compliance department** to the business, whose purpose will be to ensure that we are meeting necessary internal and external regulatory compliance. The need for this department has been considered against a greater need for focus on compliance as new regulations are introduced, our ESG aspirations have increased and our general aim to strive to do the right thing becomes even more important.

Modern Slavery prevention and compliance responsibilities will be undertaken by this new department from the next financial year. The team will continue to risk assess and internally audit our business each year to identify any potential risk areas and report back to the company's **Group HR and Operations Director**. Any risks identified will be communicated to the **Board of Directors** and necessary actions completed at the earliest opportunity within the same financial year.

Our dedicated **Ethical & Social Compliance Team** based in China, which now sits within the Compliance department, continues to audit our supplier base, working with their key decision makers to ensure standards are achieved and corrective action plans are completed. The team ensure that our factories are audited by our accredited third-party partners to the ETI base code and that our ethical standards are being maintained.

Following our annual risk assessment, we have concluded that the greater risk again lies within our Far Eastern supplier base, and we have therefore focused the greater attention of our efforts within this area of our supply chain.

## **OUR FAR EAST SUPPLY BASE**

We continue to be a member of SEDEX and Amfori, to instil the ethical working practices demanded within our Far East supplier base, to ensure these standards are met with compliance and the risk of modern slavery or human trafficking is minimised.

All new and existing suppliers are expected to sign up to our Modern Slavery declaration statement on an annual basis. For new suppliers, this involves a discussion during our initial meetings with them regarding our expectations on modern slavery, and for the declaration to be signed by one of the suppliers' senior representatives. For existing suppliers, our expectations are reiterated annually, and the declaration signed back at this time. These declarations are stored centrally at our UK head office and periodically reviewed.

Our Supplier Manual, the key document detailing our expectations to our suppliers which is signed by our suppliers, provides in-depth information regarding modern slavery, and is circulated throughout our supplier base on an ongoing basis.

To aid responsible sourcing, we require that all factories within our supplier base have a valid ethical audit on file, which has been reviewed by the Ethical & Social Compliance team. If a valid audit cannot be supplied to the team when commencing business with them, then an ethical audit will be arranged as soon as reasonably practicable and, in all cases, no longer than 3 months after onboarding.

The ethical audits monitors and records:

- That there is no forced or involuntary prison labour being carried out.
- That workers are not required to lodge deposits or their identity papers with their employer.
- That workers are free to leave their employer after giving reasonable notice.
- That workers are entitled to breaks and free to leave the premises during "off hours".
- That there is no child labour taking into consideration the local law for minimum age for working.
- Factory wages and benefits paid to staff for a standard work week meet the national legal standards or industry benchmark standards (whichever is higher).
- The amount of overtime undertaken by staff which should:
  - Be at a premium rate.
  - Not exceed the national legal standards set.
  - Not be demanded on a regular basis.

We use a variety of third parties to carry out our audits alongside our own internal teams.

We require that ethical audits have a validity of 12 months and must be renewed before expiry. Regular monitoring allows us to have continued visibility of a factory's ethical standards and to review any progress or any reoccurring issues or risks based on historical reporting. This monitoring is also supported by factory visits from the Ethical & Social Compliance team.

## **RESPONSIBLE SOURCING**

We are committed to responsible sourcing and where possible ensure key product materials are certified to the required standards. An example of this is ensuring our wood and paper products are FSC certified, which requires organisations to be audited and included in this is the monitoring of health, safety, and labour issues within the supply chain. This has also expanded to include product and shipment packaging to be FSC certified as part of our ESG strategy and targets.

## **OUR SUPPLY CHAIN PARTNERS**

We will continue to monitor the transparency statements of our supply chain partners. We now have a key contact at each of our supply chain partners who is responsible for modern slavery and who we can challenge or arrange an audit if there are any areas of concern.

The introduction of periodic site visits to our UK warehousing partners by our Compliance department will commence from 2024 as part of the annual risk assessment procedures.

## **OUR OWN TEAMS AND RESOURCING PARTNERS**

Our HR team, through robust procedures which are continually reviewed, can help to identify any potential issues of modern slavery within the UK and China workforce. We are no longer working with recruitment agencies for temporary warehousing staff, preferring to remove the risk to the business by reviewing the needs of the warehouses and increasing the permanent warehouse workforce to ensure it covers for high demand periods.

We now have established and dedicated HR resource within our Far East operation to ensure any Modern Slavery concerns within our workforce can be identified at the earliest opportunity.

Our internal China Quality Control team and Sourcing department are trained annually and help ensure any evidence of Modern Slavery in our Far East factories is identified and reported to senior management so that decisive action can be taken to rectify.

## **FAIR PAY**

We are committed to providing fair pay for our workers and offer a range of benefits and financial incentives that demonstrate this. In the UK we are committed to offering pay rates that exceed the National Living Wage and we are striving to achieve UK Living Wage accreditation in the coming years.

“During the financial year ending 31 July 2023 our entire UK workforce were paid a minimum of £11.00 per hour (Temporary roles) and £11.50 per hour (permanent positions), irrespective of age or gender, which are above the current National Living Wage rates.”

## **TRAINING AND AWARENESS**

The business requires that all key staff within our supply chain complete training on modern slavery to ensure that they understand the risks of modern slavery and human trafficking infiltrating the business or its suppliers.

Internal staff training on Modern Slavery remains to be an important topic and as such all new joiners receive training upon joining the company and existing employees receive training annually across all our international sites. In conjunction, we also provide training on Anti-bribery and the UP Whistleblowing Policy, to strengthen this message and provide methods of reporting Modern Slavery if it occurs.

The organisation will continue to raise awareness within the business especially through our Modern Slavery Committee and Employee Consultation Group. Additionally, we periodically review internal policies and procedures and will review them in the event of any major organisational changes, the introduction of new legislation or in the event of any breach of the policy.

## **OUR POLICIES AND MEASURING PERFORMANCE**

We welcome all staff, workers, and supply chain partners to come forward if they believe there is any suspected violation of these standards without fear of retaliation. We have a number of procedures and methods that enable our workers and partners to speak out and raise any concerns, these include:

- An Independent Whistleblowing Hotline and Procedure.
- Whistleblowing Policy
- Modern Slavery Act Policy
- Ethical Trading Policy
- Health & Safety Policy
- Ethical & Social Compliance Team UK & Far East
- Employee Consultation Group
- Modern Slavery Committee
- Global Annual Employee Engagement Survey

## **TARGETS AND KEY PERFORMANCE INDICATORS**

In order to measure the business is effective in ensuring that modern slavery and human trafficking is not taking place with the business or supply chains, we have a number of key performance indicators:

<b>AREA</b>	<b>TARGET</b>	<b>2023 PERFORMANCE</b>
Having 'live' suppliers audited by our Ethical teams on a continued basis. We now have this KPI reported on a monthly basis at Board Director level.	100%	<b>96.0%</b>
Reported cases of Modern slavery via our Ethical or HR teams.	0	<b>0</b>
Reported cases via our Whistleblowing Hotline.	0	<b>0</b>
Number of new & existing suppliers signed up to the Modern Slavery declaration process	100%	<b>95%</b> <b>(100% for China Factories)</b>
Number of live suppliers signed to our supplier manual (latest version)	100%	<b>90%</b>

We will continue to work with our suppliers and partners to continually improve our performance in relation to modern slavery and future progress will be reported each year.

The areas of continued focus are increasing the number of ethically audited live suppliers and ensuring the suppliers outside of the FE supplier base complete the modern slavery declarations to maintain an above 95% score. By working on these areas, we can maintain and strengthen our visibility of supplier standards, highlighting any risks earlier and raise awareness of Modern Slavery across more of our supplier base.


The UP Supplier Manual is currently under review and there will be updates to the Modern Slavery Policy, Ethical Trading Policy, and Anti-bribery Policy. These updates will provide additional information to the suppliers, encouraging further understanding of these important compliance requirements. A major focus will be to ensure full supplier take-up of the updated version once released at the end of June 2024.

We ensure that all major UK customers that we supply to, who have requirements under the Modern Slavery Act, have up to date Modern Slavery Transparency statements published on their websites. These are reviewed to ensure that we meet customer expectations on Modern Slavery. We undertake all reasonable and practical measures to ensure that these standards are implemented throughout the businesses of our suppliers and will assess any instances of non-compliance on a case-by-case basis putting remedial measures into place appropriately and providing guidance to those factories who do not meet our standards to enable them to make improvements for the future. Internally, the business is committed to continual improvement of our internal procedures and systems.

## **DECLARATION**

In doing so, this statement will be reviewed annually by the Board and any changes implemented thereafter. Andrew Gossage was authorised by the Board to sign this statement on their behalf.

This statement has been published in accordance with the Modern Slavery Act 2015, which requires businesses to disclose publicly the steps they are taking to tackle modern slavery each year.

Signed:    
DocuSigned by:  
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 Position: Managing Director  
 Date: 08 December 2023