



DEE SET

MODERN SLAVERY STATEMENT FOR THE FINANCIAL YEAR 2018

Responsibility for Modern Slavery sits with Greg Phillips, CEO of Dee Set Logistics.

We are committed to improving our practices to combat slavery and human trafficking. We recognise that forced labour and human trafficking for labour exploitation is often well hidden by the perpetrators with victims reluctant to come forward.

Dee Set are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our business.

ORGANISATION'S STRUCTURE

We are principally a provider of retail solutions, products and services to a wide range of retailers and brands.

The Group has an annual turnover in excess of £110m, and employs over 3000 people.

This statement covers our Group which is headed by Retail Solutions (Holdings) Ltd and includes: Dee Set Confectionery, Dee Set Logistics, Pascalle & Trending.

OUR PRODUCTS & SERVICES

- Distribution.
- Manufacturing.
- Print Services.
- Fulfilment.
- Store Development.
- Creative.
- Merchandising.
- Field Marketing.
- UK Market Entry.

OUR SUPPLY CHAINS

We have identified that we used over 500 suppliers in 2018.

Our top 10 suppliers account for approximately 48% of the supplier spend.

PRODUCT

- We act as an intermediary for the consolidation and distribution of products into three major retailers; this accounts for 77 of our suppliers and approximately 65% of our spend with suppliers.
- We source a number of our own products for supply into retailers.

PEOPLE

- We have used 26 agencies/recruiters to supplement our own labour pool.

The largest number of suppliers are providing various services/suppliers to enable day-to-day activities to take place, these include:

- IT Solutions - 45 suppliers, less than 2% of spend.
- Print/Packaging - 23 suppliers, less than 1% of spend.
- Equipment/Site/Maintenance - 72 suppliers, 1% of spend.
- Delivery/Logistics - 40 suppliers, 2% of spend.
- Cars/Hotels/Events - 16 suppliers, 1% of spend.

OUR POLICIES ON SLAVERY & HUMAN TRAFFICKING

We are committed to working to ensure that we have processes in place to prevent modern slavery or human trafficking in our supply chains or in any part of our business.

We have identified the need for us to have a specific policy on modern slavery and are in the process of developing this. At this time we have policies that reflect our commitment to acting ethically and with integrity in all our business relationships.

These include:

- Equality & Diversity.
- Disciplinary & Grievance.
- Flexible Working.
- Anti-Bribery & Corruption.
- Gifts & Hospitality.
- Bullying & Harassment.
- Corporate Social Responsibility.
- Whistleblowing.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We have identified that more resource was required to achieve the targets we had set for 2018. We are disappointed that we did not make the progress we anticipated. To increase our focus we now have two colleagues working together to progress our actions splitting the responsibility by products and services and provision of labour, both have attended Stronger2gether training.

Our Cosmetics manufacturing site and Imports area are still using the guidance provided by Stronger2gether. We have developed and issued suppliers in these areas with our ethical practice standards and logged receipt of supplier declarations.

We have passed ethical audits conducted by two of our key clients.

We identified that a high risk area is our use of agencies, we have ongoing arrangements with 21 agencies/recruitment companies. As a first step we have drawn up our expectations in relation to modern slavery and asked them to confirm that they are compliant with these expectations. Confirmation has been received from 7 of the 21 and steps are being taken to understand what support if any is needed by the remaining businesses.

We recognise that further work is needed and have set out our next steps under the Further Steps section.

TRAINING

We are committed to ensuring our managers and colleagues understand modern slavery and human trafficking in our supply chains and our business, how to prevent it, identify it, and act if an incidence is discovered.

We have taken the following steps:

- 2561 colleagues have completed an E-Learning course raising awareness of the risks of modern slavery this is over 96% of our total number of colleagues. This now forms part of our mandatory training, which is renewed on an annual basis.
- 68 colleagues, including line managers and colleagues in areas such as recruitment and security have received face-to-face training to understand how they can spot signs to help identify if a colleague is at risk and what to do if they suspect an incidence.

OUR EFFECTIVENESS IN COMBATING MODERN SLAVERY AND HUMAN TRAFFICKING PERFORMANCE INDICATORS

We use the following methods to measure how effective we have been to ensure that modern slavery and human trafficking is not taking place in any part of our business:

- Monitoring why colleagues leave our business by Leaving Interviews and post-employment surveys of colleagues who have left our business.
- Colleague Surveys to establish general colleague well being.
- Tracking and monitoring training completion and confidence levels in terms of understanding modern slavery post-training.
- Level of communication and personal contact with our customers and suppliers to ensure their understanding of, and compliance with, our expectations.
- Whistleblowing hotline

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken in 2018 to ensure we are reducing the risk of slavery or human trafficking in our business or our supply chains we intend to take the following further steps to combat slavery and human trafficking in 2019:

SUPPLY CHAIN

- Engagement with our customers to understand the actions they take when onboarding new suppliers.
- Review of the top 10% of our suppliers and rationalise/identify them by risk.
- Create a self-assessment questionnaire and send this to the top 10%.
- Face-to-face training to be provided to colleagues responsible for sourcing goods and services from suppliers.

PROVISION OF LABOUR

- Develop a proactive approach to checking ethical standards compliance before engaging with new labour providers.
- Introduce regular analysis of colleague data to identify patterns.
- Provide support to labour providers to meet the ethical standards we require.

We have recently acquired a new business (White Hinge) and need to audit their ethical standards and will include the actions taken in this business in our 2019 statement.

Our cosmetics manufacturing site (Pascalle) has now been sold and will not be included in any future statements.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2018.



Greg Phillips

Chief Executive Officer

DEE SET