



Modern Slavery & Human Trafficking Statement

Limitless Digital Group Limited

Introduction:

This statement sets out Limitless Digital Group Ltd (LDG)'s actions to understand potential modern slavery risks related to its business and to put steps in place that are aimed at ensuring there is no slavery or human trafficking in its own business and its supply chain.

Being part of a global supply chain, LDG recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

This statement describes LDG's policies, due diligence processes, actions taken in the financial year January 2021 - December 2021.

The Business:

LDG is a multi-brand digital retailer of heating and bathroom products, based in Lancashire, England.

Products sourced from suppliers in China, Turkey, Poland, UK and Italy are marketed to consumers in UK, Ireland, France, Germany, Netherlands, Italy, Spain, and North America via the following LDG websites:

<https://www.bestheating.com>
<https://www.bestheating.ie>
<https://www.bigbathroomshop.co.uk>
<https://fr.hudsonreed.com>
<https://de.hudsonreed.com>
<https://nl.hudsonreed.com>
<https://it.hudsonreed.com>
<https://es.hudsonreed.com>
<https://usa.hudsonreed.com>

LDG Staff:

At the end of 2021, LDG employed 267 permanent staff at its Lancashire site. Its staff are largely directly employed and are not in any category which is generally seen to be vulnerable to modern slavery in this country. Therefore, the focus is to ensure there are robust policies and procedures in place for LDG's contractors and suppliers.

In 2021, LDG continued to hire a number of temporary agency workers to its warehouse operations, to meet the unique demands being experienced. These workers were sourced via one of several approved recruitment agencies.

When recruiting, LDG requires that all recruitment agencies sign terms and conditions which provide an assurance of their compliance with legislation to prevent slavery and human trafficking. All recruitment agencies have all signed those terms and conditions. LDG does not believe there are any recruitment activities which may be considered high risk.

As part of its annual pay review policy, LDG undertakes an audit to ensure compliance of National Minimum Wage and National Living Wage requirements for all employees. In 2021, LDG paid all

employees' wages, regardless of their age, at rates of at least £0.45 per hour above the National Living Wage.

LDG also ensures that all employees' working hours are managed in line with the Working Time Regulations 1998.

LDG ensures that every employee or temporary worker has the right to work in the UK, in line with Home Office guidance for the Prevention of Illegal Working.

LDG ensures that all employees are familiar with its policies and procedures and conduct themselves in a way which positively reflects LDG's values as a fair, non-discriminatory, and equal opportunities employer.

Policies:

LDG has a number of internal policies to ensure that it conducts business in an ethical and transparent manner. LDG operates robust recruitment practices including conducting Right to Work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. These requirements extend to 3rd party providers. Our internal policies include (but are not limited to):

- Employee Handbook
- Employee Disciplinary Policy
- Resolution Policy
- Anti-Bribery and Corruption Policy
- Health & Safety Policy
- Equal Opportunity & Dignity at Work Policy
- Whistleblowing Policy
- Anti-Slavery & Human Trafficking Agreement & Declaration

These policies clearly outline the expectation and potential outcomes of intervention should a policy be breached. Any reporting will be fully investigated, and appropriate action taken. This may include notifying the appropriate statutory or legal entities.

Due Diligence:

LDG enjoys well-established and stable working relationships with key suppliers in all its territories and has achieved the support of its suppliers to the approach to preventing slavery and human trafficking. All goods are manufactured in modern factories with up-to-date approaches to corporate, social, and environmental matters.

LDG wants to ensure that members of its supply chain equally support its company values.

Since 2018, LDG has been including declarations in all its supply agreements and purchasing terms and conditions, to request compliance in respect of legislation to prevent slavery and human trafficking.

Throughout 2021, LDG has continued to secure signed declarations from all its recruitment agencies and its suppliers ensuring there is a contractual commitment in place with its suppliers, requiring their compliance with the terms and requirements of the Modern Slavery Act.

LDG continues to remain compliant by monitoring and reviewing data published in slavery advisory resources and government agency websites, to identify potential or increased slavery risks presented by any new region where it looks to source from. LDG can then tailor the audit process to increase the interrogation level around employment, slavery, and general working practices.

Training and Effectiveness of LDG's Anti-Slavery Measures:

All LDG employees who are involved in procurement have completed training on ethical procurement, which includes Modern Slavery. This training raised awareness of ethical procurement, the nature and impact of modern slavery on an organisation and its supply chains, and how the risks of modern slavery might arise in an organisation's supply chains.

All LDG employees are encouraged to report any concerns regarding slavery and/or human trafficking in accordance with LDG's whistleblowing policy.

Planned Activity for 2022:

LDG will continue to secure signed declarations from the remaining proportion of its suppliers to ensure that there is a contractual commitment in place with all its suppliers, requiring their compliance with the terms and requirements of the Modern Slavery Act.

During 2022, LDG will commence a programme of regular supply chain audits to ensure alignment to local laws, standards set out by the International Labour Organisation, the Modern Slavery Act and LDG's internal policies and standards, which include:

- Clear obligations on suppliers to comply and implement controls to prevent Modern Slavery.
- Ensuring all employment shall be voluntary.
- Confirmation of the employee's right to leave work and the ability to terminate employment upon expiry of reasonable notice.

(This action was intended to commence in 2021, however, because of increased difficulty in travelling to LDG's suppliers during the COVID-19 coronavirus pandemic, this had not been possible to commence)

LDG recognises the need to continually develop additional tools to effectively engage suppliers, particularly those in high risk countries. As this development progresses and matures, LDG will build key performance measures to help track the effectiveness of audit processes.

LDG will also aim to develop its employees' awareness and understanding of modern slavery; requiring all employees to read a copy of the home office guide: *'Modern Slavery Awareness & Victim Identification Guidance'* and a complete a short knowledge-based assessment to demonstrate their understanding. This guidance covers the definition of modern slavery and the prevalent types in the UK, spotting the signs of modern slavery, and victims and barriers to reporting.

To maintain compliance, LDG will continue to monitor government agency websites for information updates relating to the Modern Slavery Act.

Approval:

This statement was approved by the Limitless Digital Group Limited Managing Director, 30th June 2022 who will review and update it annually.



Steve Cunliffe
Managing Director
Limitless Digital Group Limited