

Modern Slavery & Human Trafficking Statement
FY: 01/07/2024 – 31/07/2025

Document Details	
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This document shall be made publicly available through our group website at www.productcaregroup.com and submitted to the relevant Governmental office on an annual basis, any enquiries relating to its content should be addressed to:

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EXECUTIVE SUMMARIES FOR REPORTING PERIOD

Head of Risk & Compliance

PCG maintains a high awareness of its Corporate and Social Responsibilities, which are steadily growing according to our vision, whilst we continue to operate in an internationally expanding, fast paced and ever-changing industry. From our directly employed colleagues to those employed by our suppliers, or through employment agencies, we pride ourselves on continuing to *Do the Right Thing – For All*.

Throughout our FY 24/25 we have continued to work with our entire supply chain to ensure that continually reviewed risk assessments, appropriate terms of engagement, and collaborative relationships remain the foundation of our on-going commitment to ensuring our supply chain remains free from modern slavery and human trafficking.

From a pool of existing colleagues, and newly appointed ones, our Supply Chain team expands under the direction of a newly appointed Supply Chain Director who takes over supply chain specific activities from a previous incumbent of the Operations Director position. This new colleague brings a wealth of knowledge intrinsic to the world of supply chains. They also have valuable intangible insights into the way in which supply chains operate. This allows us to ensure that PCG is ready for the exciting future ahead, as we seek to expand our supply chain to keep up with our business expansion.

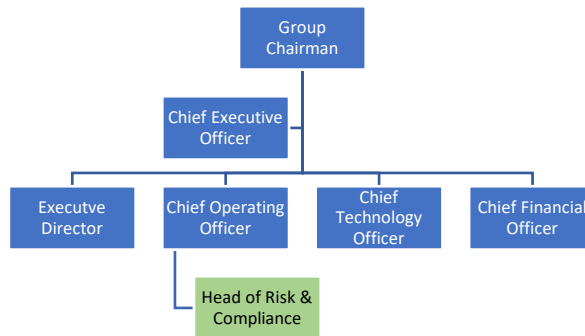
From our executive management team, through to those in the customer and supplier facing roles, we are committed to the eradication of modern slavery & human trafficking and ensure our internal policies, business ethics and reputation reflect our morals and beliefs and intentions on this subject.

Our continued commitment to collaborative relationships with our whole supply chain supports our business in continually improving not just our commercial success, but our success in *Doing the Right Thing – For All*.

Greg Webb, Head of Risk & Compliance

Organisational Structure

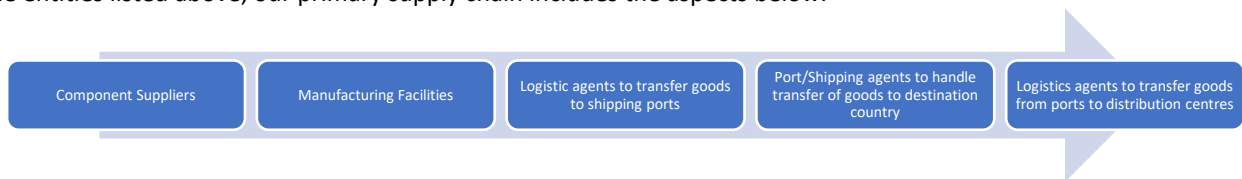
The Product Care Group continues to be led by a Chairman and Executive Board, as shown below, with the colleague responsible for our Modern Slavery & Human Trafficking reporting shown in green, with a direct reporting line to Executive Management.



The trading business entities covered by this statement are shown below.

- Product Care Group Limited
 - Product Care Trading Ltd
 - Product Care Services Ltd
 - Product Care Hub
 - Product Care Online (A trading subsidiary limited to on-line presence only)

Through the entities listed above, our primary supply chain includes the aspects below.



Within our usual business activities, either within foreign territories or in the UK, our supply chain will at various points include, but not be limited to suppliers such as

- Suppliers of components & manufacturing facilities
- Specialist haulage, international shipping or localised delivery partners etc.
- Administrative support (External Auditors, Legal Representation etc.)
- Suppliers of Temporary/Agency Workers
- Suppliers of plant, equipment, and machinery
- Waste recycling services

Modern Slavery & Human Trafficking Policy

Our policy for MSHT is primarily distributed through a controlled document known as “Product Care Group Core Policies”, which is authorised by the Board of Directors and signed by the Chief Operating Officer. The wording from that policy, in relation to Modern Slavery & Human Trafficking is shown below.

Product Care Group operates as a group of limited companies that collectively provide the following products and services.

- Import and distribution of household electrical appliances to retailers in the EEU and end users purchasing through e-commerce.
- In-house media production including lifestyle video, photography, and graphic design to support sales and as an externally available service.
- Home delivery of our own products and those of partner brands to end users.
- Third party storage and logistics of electrical appliances intended for end users.
- After sales support, products, and services to own customers and those of brand partners

Our services are used by more than 800,000 customers annually across our operational sectors, and these services are achieved with circa 260 employees across 2 sites within the UK and 12 colleagues in our China office. We import own brand products from Asia and Europe, and source additional products from UK based suppliers.

Our *goods not for resale* suppliers are predominantly based in the UK, although some suppliers have offices overseas.

Our corporate responsibilities are adopted across all levels of the corporate structure and are embedded in business practices ranging from Employment Contracts, Anti Bribery & Corruption, Safeguarding, Health & Safety and Supplier & Contractor Acquisition and Management. All companies within the Group are expected to maintain compliance to all adopted responsibilities, as are Group Partners, Suppliers and Sub-Contractors.

Our responsibilities and intentions towards compliance are integral to all relations, and these ensure that we are fair to our employees, who are treated fairly and with respect consistent with standards such as Minimum Wage and Human Rights.

An in-house team responsible for management of compliance ensures that the group is consistently achieving the minimum requirements and working towards continual improvement through the adoption of annual targets and objectives which include, as a minimum, the following:

1. Pre-qualification of suppliers to ensure we only work with like-minded companies.
2. Communicating our intentions towards all known legal requirements, to all interested parties
3. Identifying all risks within our supply chain and ensuring sufficient mitigation is in place.
4. Implement a suitable program of training, awareness and information for all interested parties including allowances for consultation and participation.
5. Adopt a whistle blowers’ policy and to ensure that all issues raised are investigated thoroughly and fairly, and if necessary, by an independent body.
6. Where issues are discovered with suppliers, supportive actions will be implemented to remediate identified issues. Where unsatisfactory improvements are made, a more suitable working partner shall be sourced.

All policies and schemes within the operations of Product Care Group shall be subject to continual improvement to go beyond the basic social and human rights regulations and to ensure the highest standards in our supply chain.

Our Sectors & Turnover

Product Care Group operate within the manufacture, import and sale of domestic appliance, and our turnover is within the £110m to £120m bracket for financial year 2024 – 2025.

MSHT Statement History

Product Care Group have been submitting statements since 2019, copies of all reports are readily available to reasonably interested parties, and requests for these should be made to the colleagues identified on the front page of this report.

Due Diligence

Understanding and implementing our compliance obligations is founded in a process for due diligence as outlined below.



Through our CSR based process of instructing the undertaking of ethical audits, working with reputable organisations, and/or those certified to ISO standards such as 45001, 9001 and 14001, Product Care Group are confident that our approach is the one that provides the most valuable and strategic support to our business and those within our supply chain, and the ongoing global efforts to eradicate Modern Slavery & Human Trafficking

Suppliers who are based in foreign territories are expected to pass ethical audits for issues such as workers' rights, minimum wage and working conditions. Where required or reasonable, we will work with such suppliers to manage any identified risks and support such businesses in meeting our expected standards.

Within our CSR based approach, supported by ethical audits and inspections, PCG seeks to ensure no aspect of MSHT such as abuse of vulnerability, deception or violence against workers manifests in our supply chain. Key indicators looked for also include, but are not limited to Intimidation, threats, debt bondage, abusive conditions (working and living), excessive/forced overtime and other indicators identified by the ILO.

Risk Assessment & Management

Our methodology for assessment and management of risks is based on the simplest form of risk assessment as shown below.

- Who is at risk?
- How are they at risk?
- What are we currently doing to manage the risk?
- What further actions can be taken?

Primary Risk Areas

Our Primary risk areas are noted on the table to follow.

Risk Ref	Who is at risk	How are they at risk	What are we currently doing	What further actions can be taken
1	Temporary/Agency Workers provided to work for PCG within UK	<ul style="list-style-type: none"> • Exploitation from unscrupulous companies/gangmasters etc • Being trafficked into the UK for forced labour 	<p>Only working with officially registered agencies who</p> <ul style="list-style-type: none"> • have effective controls to ensure Right to Work • are bound by appropriate national legislation • undergo due diligence to ensure registered and implement effective controls 	Continue to review business relationships on annual basis. HR Director liaises with internal Department Heads to ensure provision of workers to PCG is fully compliant with all applicable law.
2	Temporary/Agency Workers provided to work for organisations within our supply chain	<ul style="list-style-type: none"> • Exploitation from unscrupulous companies/gangmasters etc. • Vulnerable people being trafficked within other countries • Forced labour, illegal welfare and/or accommodation arrangements 	<p>Only working with suppliers who</p> <ul style="list-style-type: none"> • pass ethical audits, or • are officially registered and use officially registered agencies/labour organisations etc. 	Continue to conduct ethical audits on factories and ensure companies we work with are officially registered and implement effective controls
3	Workers in China or other global regions such as Turkey and UAE	<ul style="list-style-type: none"> • Some regions of China are still susceptible to forced labour, and some areas of China are listed as a concern in recent Human Rights & Democracy Reports • Regions including Turkey and UAE are listed as some of the highest risk areas for modern slavery 	<p>Only working with suppliers/factories in areas where there are</p> <ul style="list-style-type: none"> • more developed policies and implementation of human rights • stronger policies, actions, and attitudes towards eradicating forced labour, human trafficking, and modern slavery <p>Ensuring that suppliers we create business relationships with have an acceptable approach to ensuring modern slavery is not happening within their business</p>	<p>Continue to monitor</p> <ul style="list-style-type: none"> • political events and developments within the Chinese economic area, and other at-risk areas • published reports from UK Gov and organisations such as FCDO (Foreign, Commonwealth and Development Office) • due diligence on global regions we seek to create new relationships in

4	Product Care Group	<p>At risk of reputational/financial harm if</p> <ul style="list-style-type: none"> involved in direct or indirect business relationships with unethical companies or factories factory or ethical audits are doctored or not conducted sufficiently independent and/or free from bribery or threats of reprisal 	<ul style="list-style-type: none"> Due diligence on business arrangements and contracts Ensuring contracts have clauses for MSHT Pre-Qualification Questionnaires All factories are audited by PCG at onboarding, and on an annual basis and must hold BSCI/SMETA <ul style="list-style-type: none"> (BSCI – Business Social Compliance Institute) (SMETA – Sedex Members Ethical Trade Audit) All factories must follow the ETI (Ethical trading Initiative) base code. 	<ul style="list-style-type: none"> Continue to review business relationships on annual basis Increase training and awareness for colleagues responsible for negotiating contracts and business arrangements Further audits undertaken, include but not limited to <ul style="list-style-type: none"> PCT (Product Care Trading) Quality ETI Base Code, SMETA (SEDEX) and/or Wal*Mart Ethical Standards BRC/ISO 9001, Full SQP (Supplier Qualification program) and/or FCCA (Factory Capability & Capacity Audit) SCS (Supply Chain Security) ISO 14001 Environmental Audits ISO 50001 Energy Management ISO 45001 Health & Safety
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Secondary Risk Areas

Shipping Lanes, Suppliers & Port Operators

This is an area of business where causal & temporary labour can be a major factor in business operations, where employees could be employed on zero hour or other contract types that could allow for easier violation of human rights, and occurrences of modern slavery, illegal importation of items of product or people could be high.

To help us in managing our risks, Product Care Group now only work with a small number of shipping agents, all of whom hold a similar approach to modern slavery & human trafficking as PCG.

As of publishing date for this report, there is no intelligence that would indicate any problems on any vessels we have shipped on, and there are no known issues within UK docks. There have also been no reports of issues with labour organisations or unions within our supply chain.

Clients & Suppliers

If we fail to include our stand on Modern Slavery & Human Trafficking in our business arrangements with clients & suppliers, we could potentially help to create a weakness in our supply chain, that could be exploited by immoral and unscrupulous organisations.

To manage this risk, we ensure that their stance on Modern Slavery & Human Trafficking at least matches ours, and that the topic is covered in T&C's and that published policies/reports are available and checked.

Failure to Deliver Training & Awareness

If we do not raise awareness of Modern Slavery & Human Trafficking, or fail to provide training, our colleagues could potentially fail to spot signs and indicators that point to Modern Slavery & Human Trafficking.

Goals and Key Performance Indicators

Our ultimate goal is to ensure that Modern Slavery & Human Trafficking is not part of, or supported by, our supply chain or business activities. To achieve this goal, we conduct our business arrangements in accordance with all known Legislative requirements for all national and international jurisdictions we operate in, and make it clear to our business partners, suppliers, or clients that we expect the same approach from them.

Our KPI for this goal is whether we are subject to enforcement actions from relevant authorities.

To date, we have had no enforcements raised against us and have not been the subject of any legal or other investigations related to Modern Slavery and Human Trafficking.

Our secondary goals are:

- To always be clear and transparent in our intentions and business arrangements that support achievement of our primary goal.
- To provide all colleagues with relevant knowledge where appropriate, on the impacts of Modern Slavery and Human Trafficking, and how to ensure we do not allow for it within our supply chain.
- To build responsible business relationships with like-minded organisations.

Training, Education & Awareness

At present, our training, education, and awareness program is aimed at members of the Executive & Senior Management Team to ensure that there is leadership & commitment to the subject matter, with professional and legal support from external suppliers to help ensure Product Care Group maintain an awareness of the global requirements of eradication MSHT from our supply chain.

Within FY 24/25 our business account managers, as well as those managers responsible for factory/supplier relationships have continued to build relationships built on a solid understand of good ethical practice, with appropriate contractual arrangements on modern slavery, human trafficking and general welfare of those across the whole relationships.

Training has been rolled out throughout the relevant aspects of our organisation to new starters and refresher training is being planned to an appropriate schedule for FY 25/26.

Continual Progress

Our core areas of progress lie in ensuring that key individuals across the business understand MSHT and where it can manifest within our supply chain and how it may do so. This is supported by our supplier handbooks, legally reviewed contracts of employment and terms of engagement for use with clients and suppliers alike.

We also engage with, and will continue to do so, 3rd party auditors who can independently visit our overseas suppliers and conduct audits that ensure our suppliers hold a like-minded approach to eradicating MSHT from the supply chain.

As our business continues to grow, so will our efforts to monitor and protect our colleagues, and those of our suppliers from the effects of MSHT.

Actions on Identified Indicators of Forced Labour

In the several years that PCG have been submitting MSHT statements, we have never found any indicator of MSHT such as those listed by the ILO within our supply chain.