

Domu Brands Limited

MODERN SLAVERY ACT

TRANSPARENCY STATEMENT

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

OUR APPROACH

Domu Brands Limited sources, develops and distributes own label consumer goods direct from manufacturing origins. We trade through online channels direct to customers through various third party and own platforms and our products are available to buy in the UK, EU, North America and Canada directly.

We are committed to eradicating modern slavery – we will not tolerate or knowingly work with any suppliers domestic or international that are involved with any form of slavery including, but not limited to human trafficking and exploitation.

DOMU BRANDS COLLEAGUES

All new colleagues are required to read and accept the policies outlined in the Company Handbook. The Handbook provides our colleagues details of our key policies including Health & Safety, Code of Conduct, Pay & Benefits, Recruitment & Equal Opportunities, Bullying, Harassment & Anti-Bribery and Whistle-Blowing.

Our HR Department will also look to implement some additional training to raise awareness of Modern Slavery and how to report it.

Domu Brands is also reviewing our third party policies for service providers and goods not for resale.

DOMU BRANDS GLOBAL SUPPLY CHAIN

We recognize that our biggest risk for modern slavery is in our global supply chain – our Partners are based throughout China, Taiwan, Vietnam, Malaysia and EU. During 2018 we have embarked on a factory disclosure program with our current & new suppliers to the business.

Domu have also published a Responsible Sourcing Policy which is based on the ETI base code and stipulates that all suppliers must disclose the actual place of manufacture.

All factories where Domu final product is produced must attain an industry recognized Social Compliance audit such as a BSCI / SEDEX, etc. that has been performed by a third party.

The SC audit must provide evidence that:

- There is no child labour (in accordance to the legal working age of that country)
- Employment is freely chosen and workers are able to have Freedom of Association
- Workers can give reasonable notice and leave without any repercussion
- Workers are not required to lodge deposits or their identity papers
- No excessive hours (in accordance to the legal working hours of that country)
- Any overtime is properly compensated and not excessive (in accordance to the legal working hours of that country)

- Workers are paid fairly and regularly (in accordance to the minimum set in that region / country / industry / etc.)
- No discrimination based on gender, religion, ethnicity, etc.
- Health & Safety regulations meet the national requirement
- Must be dated within the last 24 months

OUR COMMITMENT

From January 2020, Domu will implement a new sourcing policy that requires that all new factories supplying own label products must acknowledge the modern slavery statement and hold a third party Social Compliance audit or agree to work towards an audit within an agreed timeframe and at Domu's discretion.

Factories without an audit will be contacted and engaged to prepare for a Social Compliance audit within an agreed timeframe (12-36 months). All factories are expected to comply with the DOMU Key Compliance Scheme within 6 months regardless of status. Any suppliers that refuse will be given notice to exit and items will be resourced to compliant factories.

All suppliers must agree to factory visits for social compliance inspections / checks by our teams or approved third party representatives in country.

CONTINUED IMPROVEMENTS

We will take all reasonable measures to ensure that we implement our commitment as outlined above.

The effectiveness, progress and objectives of this statement shall be reviewed as part of the annual Management Review meeting.

This statement will be updated in 12 months and take into account any changes within this time frame.

Dated: 1st January 2020

Signed:

Craig Foster, CCO

A handwritten signature in blue ink, appearing to read 'Craig Foster', is written over a horizontal line.