



Modern Slavery Act 2015 Statement 2021 to 2022

Our structure, business and supply chains

FKA Brands Ltd. (FKABL) and its subsidiaries are a wholly owned subsidiary of Ludgate 329 Limited and the ultimate holding company is FKA Distributing Co LLC (FKA) a US limited liability partnership. FKABL is the only trading subsidiary of FKA in the UK. FKABL is an SME of 88 people based in Kent. The Directors of FKA Brands Ltd have approved this Section 54 statement for the reporting period October 2021 to September 2022 for the Modern Slavery Act 2015.

FKABL believes that slavery is unacceptable and remains committed to combatting slavery in all its forms. FKABL purchase electronic, small electrical and non-electrical products and services from approximately thirty third party factories and service providers located in Vietnam, China, Belgium and the UK. Using the SEDEX risk assessment tools China and Vietnam are considered high-risk areas along with the associated raw materials, especially minerals which may come from high-risk countries. For the individual factories the SEDEX tools calculate that all our Chinese and Vietnamese suppliers are assessed as medium risk.

FKABL has been a member of SEDEX since 2009. Usually, all our factories are required to be member of SEDEX and assess their compliance to the SEDEX ethical standards which include that Forced Labour of any kind is not used, that their recruitment processes are fair and that employees are free to join unions, councils etc. SEDEX is the world's largest collaborative platforms for sharing responsible sourcing data on supply chains, used by more than 50,000 members in over 150 countries.

As anticipated in our statement for the previous period no further masks were purchased by FKABL to support public health during the Covid Pandemic in this period. During the period Oct 2020 to Sept 2021 FKA sold the Salter brand resulting in FKA purchasing fewer items from a smaller number of suppliers during this reporting period.

FKABL purchased from 5 factories in 2022 that are not members of SEDEX which represents 3% of our purchased volume. FKABL stopped purchasing from 1 of these factories during 2022 and the remaining factories only account for 2% of the 2022 purchased volume and all were new suppliers with 3 of them supplying a single SKU.

FKABL utilizes the services of HoMedics Information Consulting (Shenzhen) Co., Ltd a wholly owned subsidiary of FKA and these employees ensure our policies and procedures are adhered to within the Chinese factories.

FKABL supplies to customers in the EMEA region using market leading warehouse and logistics companies.

Our policies in relation to slavery and human trafficking

Before a purchase order is placed with a new factory they must sign and agree to our terms and conditions which require that no forced labour of any kind be used in the manufacture of our products. These conditions include our Ethical Policy which can be found here. Our conditions are generally updated annually. All our manufacturers have signed our terms and conditions in the last 24 months.



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Our due diligence processes regarding slavery and human trafficking in its business and supply chains

To ensure adherence to this requirement FKABL has the following processes in place:

- All FKABL staff that regularly visit our suppliers, conduct UK recruitment or appoint contractors are trained to spot signs of forced labour. We use training modules supplied by the Safety Media and SEDEX platforms.
- Factories are audited by FKA employees before approval is given for the factory to become a supplier to FKABL and audited at least every 2 years.
- Other Chinese FKA employees such as Expeditors and Pre-Shipment Inspectors regularly visit the factories, are required to look for signs of any forced labour and must report any concerns.
- FKABL employees from the UK and FKA employees from the USA also visit the factories, they are required to look for signs of any forced labour and must report any concerns. These include the Senior Management, Quality & Compliance, Operations and Marketing. Due to the Zero Covid response in China it has not been possible for employees from the UK or USA to conduct visits in this reporting period. FKA have supplemented the onsite visit by the regional employees with remote sessions with our suppliers and these will continue into the next reporting period. These sessions include feedback on our annual surveys covering Forced Labour, Child Labour, Conflict Minerals and their SEDEX Risk Score.
- In 2022 each supplier confirmed that they comply with the Uyghur Forced Labor Prevention Act.
- Each year FKABL survey's it's Chinese and Vietnam suppliers regarding policies on Forced Labour, Child Labour and Conflict Minerals along with other surveys on environmental issues. The surveys contain links to subject matter related to the survey. The surveys include questions on their monitoring of second and third tier suppliers.
- The Employee Handbooks detail our whistleblowing policies.
- If FKA detected the use of Forced Labour in any of its suppliers FKA would:
 - Immediately stop all production
 - Work with the factory on a corrective action plan
 - If a plan could not be agreed upon, we would remove the supplier from our Approved Supplier List.
 - Notify our Trade Associations
 - If necessary, notify the local authorities and provide any evidence obtained by FKA
- Our factories are also used by other leading global manufacturers and retailers who also conduct similar audits to FKA.
- FKABL supplies leading UK retailers who require many of our factories to be independently audited to SMETA, BSCI, RBA standards by reputable EU based auditors (Intertek, BV, TUV, SGS, UL etc.). In 2015, 66% of our volume came from these audited suppliers; this has shrunk slightly to 95% of our suppliers in 2022 because we stopped purchasing from some large suppliers of Salter products in this period.



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- Currently no employees in the UK offices have trade union membership. Employees in the UK, our service providers and our factories have the right to freedom of association and are allowed to join a trade union or similar organisations.
- To date, no evidence of Modern Slavery has been detected by FKABL during our own or third-party audits.

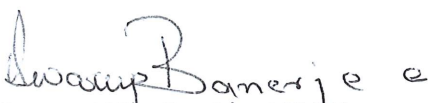
In our 2022 survey of our suppliers:

- 100% are aware of the need to monitor the whole supply chain the same as the previous year.
- 100% are already monitoring their suppliers up from 94% last year.

In the previous period we followed up with suppliers on the survey and SEDEX scores as anticipated. We were unable to recruit for the new Social Governance position in the reporting period. The recruitment is planned for the next reporting period. A Sustainability Steering Committee was established in the reporting period lead by the EMEA Head of Quality, sponsored by the Exec VP and GM of Health and Wellness and made up of senior manager and colleagues from each region where FKA operates. This helps ensure that all regions maintain the focus on looking for signs of forced labour, worker conditions as well as our environmental impact.

During the coming year FKABL. will be

- Following up on these results to review the supporting evidence, ensure that all suppliers are monitoring their supply chain and improve the monitoring of our supply chain.
- Continuing to use the SEDEX RADAR Tool to identify the factories at the highest risk and work with them to address the areas that require improvement
- Further progress will be made with the Global Environmental and Social Governance project which will enhance our ability to spot any signs of Modern Slavery

Swarup Banerjee 
Chief Executive Officer and Vice President EMEA

DATE 20-02-23



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