

The Matchstick Men Group



Modern Slavery & Human Trafficking Statement FY July 2020 – June 2021

Document Reference	
Approved By	Board of Directors
Date Approved	
Document Owner	Group Risk & Compliance Manager

This document shall be publically available through our group website at www.matchstickmengroup.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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THE MATCHSTICK MEN GROUP POLICY

Within the Matchstick Men Group¹, an in-house team responsible for management of group-wide Risk & Compliance ensure that the group is consistently achieving the required standards and maintain continual improvement through the adoption of the following core policy statements

- 1) The MM Group is committed throughout all levels of its organisation through self-set standards and the willing and active adoption of the requirements of The Modern Slavery Act 2015, to achieve the highest level of ethical standards and internal governance possible. Thus, ensuring that Modern Slavery & Human Trafficking does not enter our supply chain or business relationships in any form.
- 2) We will adopt and implement a zero-tolerance approach to human trafficking and modern slavery and any and all forms of corruption and bribery associated with these criminal acts wither directly or indirectly
- 3) As an operator in international and national level business, we fully support the Governments objectives in eradicating modern slavery and human trafficking
- 4) All business partners, suppliers and retail/wholesale partners will be encouraged to undertake a similar approach to modern slavery and human trafficking as the MM Group
- 5) We will willingly and transparently undertake annual reporting on this matter, and submit our reports accordingly.

Gavin Hamer, Group Chairman



Date: 17/8/2021

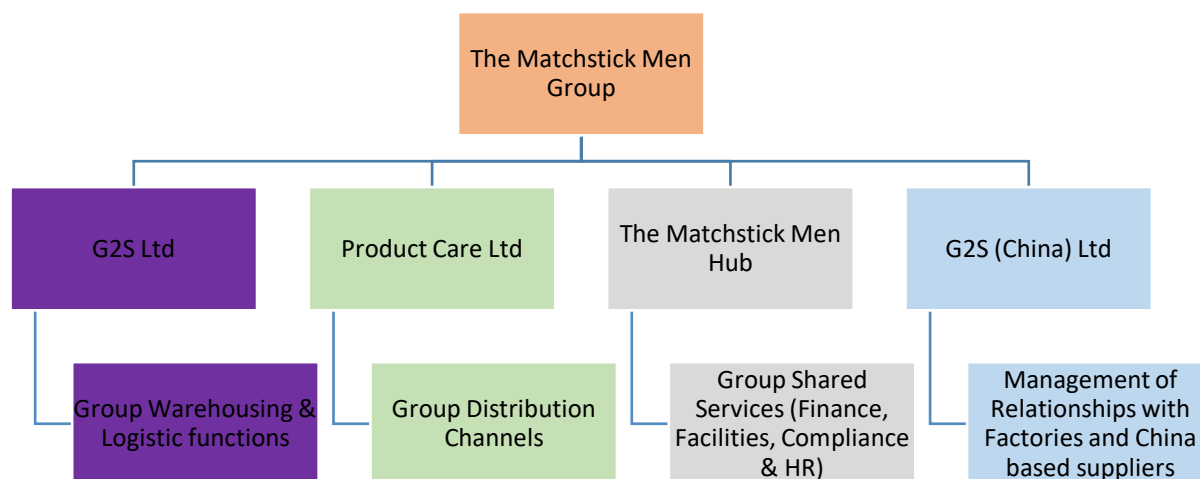
¹ Matchstick Men Group – May also be written as MM Group or The Group

STATEMENT INTRODUCTION

The Matchstick Men 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 to end users
- After sales support, products and services to own customers and those of brand partners

The Matchstick Men Group organisational structure is shown below.



With the success of our Group in the last financial year, and with projected business, strategy and other changes within the organisation, we will soon be rebranding as **The Product Care Group**. Successive statements for Modern Slavery and Human Trafficking will be altered to reflect the changes being made in the latter half of 2021.

Collectively, our services are used by more than 800,000 customers annually across our operational sectors, and these services are achieved with circa 200 employees across 2 sites within the UK and a further 12 employees 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. All such actions, policies and operational controls are authorised and supported by all company directors.

Our responsibilities and intentions towards compliance with The Modern Slavery Act 2015 are integral to all relations, and these ensure that we are fair to our employees, who are treated fairly and with respect through the adoption of standards such as Minimum Wage, Equality and Human Rights.

ACTIONS SINCE LAST STATEMENT

Since our last statement was issued, we have remained committed to providing a source of sustainable employment through application of all aspects of Corporate and Social Responsibility with an unwavering commitment to ensuring that slavery and human trafficking does not enter our supply chain, and we continue to ensure those organisations sharing our supply chain hold the same beliefs.

We have continued to apply 3rd party audits at critical points in our supply chain, and we are proud to know that there are no known or identified aspects of slavery or trafficking within our supply chain.

Within our own organisation and those that we work with, we have evidenced application of all relevant Employment Laws and other requirements such as the Human Rights Act, and of course the implementation within organisations to adhere to the requirements of combatting modern Slavery and Human Trafficking.

An internally and voluntarily initiated Audit & Risk Committee comprised of key personnel including Directors, Senior Management and our Group Risk & Compliance Manager work tirelessly to ensure that all risks to our organisation are monitored, managed, mitigated and where possible eradicated from our activities and those of our suppliers.

A continuing program of audits, verification checks and implementation of robust and collaborative business relationships remain in place with key clients and suppliers who all share the same vision of eradicating slavery and trafficking.

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SUPPLY CHAIN

We have conducted audits against key organisations within our supply chain, and evidence of these can be provided to interested parties upon request. These audits show that our suppliers and clients are committed to the same belief as us, and there is no evidence to suggest there are aspects of slavery or human trafficking in our supply chains.

Our audits and inspections show that working conditions and remunerations are fair and in line with all applicable and relevant legislation, and all employees across our supply chain are treated fairly and are able to work in environments conducive to sustainable and profitable employment, under the direction of fair and appropriate management.

BUSINESS RELATIONSHIPS

Our business relationships are founded on many years of trust and knowledge, fairness and transparency and we will continue to build on those relationships, as well as where appropriate and possible forge new alliances with like-minded organisations.

We will proudly communicate at all available opportunities to our suppliers and clients, our intent to eradicate slavery and human trafficking from our supply chain, and will work with any of our suppliers where required to disseminate knowledge and processes that can be used to combat the unacceptable practices of slavery and human trafficking.

PROCUREMENT PROCESSES

Our processes for procurement are also founded on long term relationships, where we trust and expect our suppliers to only supply responsibly sourced services or materials, whether that is cardboard for our packaging, or the use of human labour to complete business agreements. Such labour is expected to be compliant with all international laws regarding Human Rights, Employment Laws and Anti-Slavery and Human Trafficking laws.

Audits on our procurement processes show that as in other areas of our supply chain, we are free from identified and/or known aspects of Human Trafficking or Slavery.

OUR EXPECTATIONS ON COMMITMENT IN BUSINESS

When we partner with businesses for the first time or renew existing contracts, we will always communicate our intent to comply with **all international employment laws** and ensure that slavery and human trafficking are not welcome in our supply chain, and we will report any known breaches of such laws to the relevant authorities.

REPORTING OF NON-COMPLIANCE

We will ensure that non-compliance found anywhere in our supply chain will be reported to the highest and most relevant authority. We will work with any regulatory or enforcement body or agency to mitigate the risks or eradicate identified existences of slavery, human trafficking or other legal violation.

To date, we are **immensely proud** to confirm that we have never had to report any identified violation within our supply chain, and we will focus our relevant efforts on ensuring that this figure remains at zero.

NEXT STEPS

EMPLOYEE ENGAGEMENT, RESPONSIBILITY & AWARENESS

Within our Group, we engage relevant colleagues at all levels on how to identify and report on issues related to slavery and human trafficking within our supply chain. We also provide training and awareness of key subjects to include when forging new relationships.

Within our organisation, it is the responsibility of everyone to be aware of the signs of slavery and human trafficking, and all colleagues have a duty to report any suspicions or concerns to their relevant manager.

Copies of this document are freely available to all colleagues within the organisation to help build awareness.

ON-GOING RISK ASSESSMENT & MITIGATION

We will continue to apply internal risk assessments to processes used to build and manage relationships within our whole supply chain, and where required, this may include 3rd party audits of supplier's processes, premises and activities.

Where risks are identified, we will apply the standard hierarchy of controls to mitigate or eradicate those risks, and where required, we will sever ties with irresponsible organisations if they refuse to work with us to combat such risks.