Slavery and Human Trafficking Statement

UKG is thoroughly committed to ensuring that neither slavery nor human trafficking is occurring in our business or in our supply chain. UKG has taken numerous steps to mitigate the risk of unknowingly engaging with an individual or company involved with slavery and human trafficking. UKG acknowledges that there is always the potential to improve the processes that are in place and as such UKG views this matter as a constantly evolving project.

UKG recognises that not all parts of the supply chain are exposed to the same degree of risk and as a result UKG continues to focus its attention on our overseas supplier base. UKG employs an associate with the core responsibility of ensuring that appropriate supplier due diligence, including review of ethical labour practices, has been performed.

UKG uses our membership in the Suppliers Ethical Data Exchange (SEDEX) and the associated obligations of being subject to SEDEX member ethical trade audits (SMETA) as a driver to mitigate the risk of exploited labour existing within our supply chain. In turn UKG encourages and expects our overseas suppliers to be SEDEX members or to participate in other social compliance audits as described below. SEDEX member ethical trade audits include checks to ensure ethical labour practices. If an overseas supplier is not a SEDEX member then it is likely they are subject to audits prescribed by specific customers which also typically include consideration of ethical labour standards. Should a supplier be neither a SEDEX member nor subject to a customer audit then UKG's ultimate parent company, American Greetings Corporation, will engage a third party auditor to perform appropriate due diligence prior to the commencement of trade. UKG has a zero tolerance approach if modern slavery is found within the supply chain and in the event a supplier fails to take adequate steps we will exclude them with immediate effect.

UKG also understands that the issue of modern slavery is not a problem confined to businesses based overseas. UKG requires that domestic suppliers confirm compliance with the Ethical Trading Initiative (ETI) base code. The ETI base code describes how employees should be treated fairly regardless of their location in the world. Fair treatment precludes slavery and human trafficking. Agreement with the ETI base code is achieved when our suppliers sign up to our standard terms and conditions of purchase which contractually obligates them to comply with the provisions of the ETI base code.

UKG takes the responsibility of ensuring ethical business practice seriously and routinely assesses the supply chain to identify potential business risks, slavery and human trafficking being one of many, with the aim of reducing business risks. During the current fiscal year this process of continual improvement led to the integration of an ethical labour questionnaire into our domestic vendor selection process. This questionnaire helps to identify areas of concern that would demand investigation prior to appointing them as a supplier to the business. Modern Slavery considerations are, by design, an integral part of our vendor acceptance criteria.

UKG shall continue to encourage strong relationships with our supply chain partners with the aim of further reducing the risks outlined above.

Approved by the board of directors on 21st March 2019;

Signed by Adrian Smith

Title Director