

ANTI-SLAVERY STATEMENT

JANUARY 2023



DOT & CROSS
DESIGNS

SCOPE

Dot & Cross Designs commits to developing and adopting a proactive approach to prevent, respond to and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces.

In accordance with Section 54 of the Modern Slavery Act 2015, the Dot & Cross Designs is required to prepare an anti-slavery and anti-trafficking statement for each financial year, setting out what steps it has taken to ensure that modern slavery is not taking place in its business or supply chains.

COMMITMENT TO TACKLE MODERN SLAVERY RISKS WITHIN OUR BUSINESS

A Workforce Incident Management Team has been established to tackle modern slavery risks within the business.

Competent and trusted managers have been assigned to the Workforce Incident Management Team and have received the training required to fulfil their roles:

All members of the Workforce Incident Management Team have attended modern slavery awareness training and understand the Response Plan.

Investigation Managers have been trained in investigative interviewing skills and good practice techniques for handling cases of forced labour.

First Aider training is up to date and certifications are valid.

All managers, supervisors and support staff understand that their key role, where potential indicators of forced labour are identified, is to safeguard the safety, health and welfare of the potential victim and others, not to conduct an interview or formal investigation. All managers, supervisors, support staff and workers are aware not to engage with suspected exploiters. In all situations, it should be borne in mind that job applicants, workers and their families may be in real and serious danger from violent exploitative individuals or organised criminal gangs. The protection of these at-risk individuals is paramount and must take precedence over all other considerations.

Investigation Managers who may engage with potential victims understand to risk assess and consider their actions very carefully and be aware that what they say and do may impact directly on people's lives, including their own, and on potential victims' and other employees' safety. Investigation Managers are trained how to act and what to say and do to build trust and rapport with potential victims – to remain calm, listen carefully, be empathic and demonstrate understanding and concern etc. Potential victims often do not disclose in the early stages of an inquiry, but this rapport- building will support the ongoing process. Investigation Managers understand their role in optimising the potential victim's control over their own situation by being transparent and allowing them to understand the options and process, seeking to establish their views and wishes and being careful to balance the individual's rights, any risks and your

responsibility. The Workforce Incident Management Team is aware that, where potential indicators of forced labour have been identified, they must stop internal investigations and escalate to an external authority. They understand that to continue the internal investigation could increase the risk to the workers, damage evidence, alert offenders and undermine a criminal investigation. The Workforce Incident Management Team understands the role of national bodies with regards to enforcement, victim protection and support, and appropriate relationships are established with local GLAA Officers and Police, modern slavery charities, care providers and safe homes in your area (see <https://www.humantraffickingfoundation.org/support-services> for a map of support services for survivors of trafficking in the UK). A remediation team is responsible for delivering the remediation programme for Dot & Cross Designs Ltd. This team consists of representatives from the workforce, managers, trade unions (if active in the workplace), specialists and local NGOs with expertise in modern slavery where available.

Dot & Cross Designs Ltd has implemented the following management systems to prevent and address modern slavery risks:

- an anti-bribery and corruption policy
- a Responsible Recruitment Policy
- a workplace Incident Investigation Checklist
- a workplace Critical Issues Report,
- a worker questionnaire

ASSESSMENT OF MODERN SLAVERY RISKS WITHIN OUR BUSINESS

Dot & Cross Designs takes the following steps to assess risk across our operational sites, labour providers, recruitment intermediaries and contractors:

- List all operational sites within our business or departments within our site.
- List all contractors and recruitment intermediaries including labour providers, sub-contracted agents and labour brokers that service these sites / departments.
- Identify who owns the contract for each and educate those stakeholders on the reason for risk profiling.
- Collect information on annual spend and length of relationship for each contractor and recruitment intermediary, including forecast spend for the following 12 months. Determine what is considered high spend for our business/ site.
- Assess risk for each site, contractor and recruitment intermediary to help identify how likely they may be impacted by modern slavery issues. Risk factors to consider: industry/ site type; % of migrant workers; % of temporary / agency roles; % of fixed-term contract roles; skill profile; labour sourcing channels.

For further information contact info@dotandcrossdesigns.com.

ACTION TO PREVENT AND DEAL WITH IDENTIFIED RISKS OF MODERN SLAVERY WITHIN OUR BUSINESS

Dot & Cross Designs has a number of workforce engagement initiatives and responsible recruitment policies to take action to prevent and deal with identified risks of modern slavery within our business, these include:

- All workers are issued with a “Stronger Together” multi-language leaflet to raise awareness of how to recognise and report hidden exploitation.

- Our sites display the “Stronger Together” posters, displaying them on notice boards and other places where they may be viewed by all workers.
- Induction training for new workers includes a section on how to recognise and report the indicators of forced labour and hidden worker exploitation.
- All existing workers have been trained on how to recognise and report the indicators of forced labour and hidden worker exploitation.
- Supervisors and support staff are trained to spot the signs that may indicate potential worker exploitation and how to report any concerns to appropriate managers.
- Regular briefings and a variety of engagement activities are conducted with your workforce to ensure that the risks and responses to hidden labour exploitation and modern slavery are kept current and live.
- Our Modern Slavery Lead engages with supervisors and team leaders to ensure that they are confident in identifying, deterring and reporting forced labour and hidden labour exploitation, and that they are trained and instructed to whistleblow where they have a concern over another manager, supervisor or labour provider consultant, and to facilitate two way collaborative discussions about how arrangements and activities to address exploitation risks may be improved.
- Modern slavery and hidden labour exploitation are agenda items during regular progress/health and safety meetings
- All our recruitment is direct recruitment in line with our responsible recruitment policy. For more information, see our responsible recruitment policy.
- Our Worker Welfare Officer speaks in workers’ first languages to gain the trust of fellow workers to come forward with information on workers experiencing difficulties.
- We have a published whistleblowing procedure communicated to the whole workforce whereby workers, staff, supervisors and managers can confidentially raise issues of concern to a member of the senior team and issues in the public interest externally without fear of retribution.
- Our sites have implemented and communicated a variety of channels through which issues can be raised confidentially, such as: In writing or verbally to trained and trusted Worker Welfare Office or through an independent specialist multi-language confidential helpline
- Our site undertakes random checks across shifts and departments which assures that workers understand hidden exploitation and forced labour risks, how to spot the signs and indicators and how to respond and report these.

RESPONDING TO PROTECT AND PROVIDE REMEDY FOR VICTIMS OF MODERN SLAVERY WITHIN OUR BUSINESS

Our Response Plan details how our business will ensure that it responds effectively to potential indicators of modern slavery to safeguard and provide appropriate support to victims. Our Remediation Policy details how our business will enable victims to receive relevant information, access to justice and reparation for harm suffered, with the objective of restoring individuals to the situation in which they would have been, had the impact not occurred.

For further information contact info@dotandcrossdesigns.com.

MONITORING PROGRESS TO PREVENT, RESPOND AND REMEDIATE RISKS

Dot & Cross Designs commits to conduct an annual risk assessment to prevent, respond to and remediate the risks of modern slavery within our business with regards to direct workers, agency workers and on-site contractors

Dot & Cross Designs will conduct a formal review of all procedures and arrangements annually for ongoing continuous improvement.

COMMUNICATING THE STEPS WE HAVE TAKEN TO PREVENT, RESPOND AND REMEDIATE RISKS

Dot & Cross Designs has appointed a member of the Workforce Incident Management Team with responsibility for communicating its efforts and effectiveness to prevent and address modern slavery and hidden labour exploitation risks. They have attended Stronger Together training and has an in depth knowledge of modern slavery and hidden labour issues

Dot & Cross Designs has made a public commitment to addressing the risks of modern slavery by becoming a Stronger Together Business Partner.

Dot & Cross Designs communicates its efforts to prevent and address modern slavery risks to a range of audiences including affected stakeholders, shareholders, investors and any other party interested in the company's human rights performance.