



## **PZ Cussons Group Modern Slavery Statement for the financial year ended 31 May 2022**

This Statement is made by PZ Cussons plc and its affiliates and subsidiaries within the UK and overseas (the "Group"). pursuant to section 54 of the Part 6 of the UK Modern Slavery Act 2015.

It sets out the steps which we have taken during the financial year ended 31 May 2022 to mitigate the risk of modern slavery in our business and our supply chains.

### **Introduction**

Our approach to business is encapsulated in our purpose, principles and values which seek to create sustainable value for all our stakeholders, including our shareholders, customers and consumers, business partners, local communities and our employees. We believe that sustainable, long-term value creation is only possible in an environment which is open, honest and fair and which treats all stakeholders with respect and integrity.

The integrity of our supply chains, supported by our recently-refreshed Supplier Code of Conduct and procurement policies, help us to ensure that we do not engage directly or indirectly with slavery or human trafficking or with any organization that practices same. This is a priority for the Board of Directors.

### **Our organisational structure, operations and supply chains**

PZ Cussons plc is a UK-headquartered, FTSE-listed international consumer products business. PZ Cussons plc operates in selected markets in Africa, Asia, Europe and North America either directly or through its subsidiaries (the **Group**), including PZC Australia.

The Group produces, markets and sells some of the world's most well-known and loved brands in the categories of personal care, beauty, home care, baby food and nutrition, and electricals categories.

The Group manufactures products in each of its categories in its own factories across multiple countries. In addition, a proportion of total sales is derived from finished goods which are manufactured by third parties.

The Group is reliant on a wide range of raw materials to produce its products, both within its own manufacturing processes and the wider supply chain. Respecting human rights and other ethical and environmental issues in the wider supply chain is a responsibility which must also be borne by the Group's suppliers. The Group's members play an active role in supplier development and have adopted various means to clearly communicate our expectations with our suppliers.



## **The risks of modern slavery practices in our Group operations and supply chains**

The 'risks of modern slavery practices' means the potential for the Group to cause, contribute to, or be directly linked to any of the defining indicia of modern slavery through our operations and supply chains.

In relation to our operations, we have a high degree of transparency and control over our human resources and labour systems and, accordingly, we do not consider that our direct operations are a significant source of risk for the Group. Notably, we can identify and assess risks through the reporting mechanisms we have established, including the Whistleblower Policy which facilitates reporting of suspected misconduct or an improper state of affairs. Our Code of Ethical Conduct also requires that all employees and suppliers report any suspected non-compliance with the Group's policies and applicable laws (including modern slavery laws).

In relation to our supply chain, potential risks relate to the materials, goods and services we source through the Group and our own Tier 1 suppliers. These include possible risks of modern slavery in relation to deceptive recruiting practices, child labor, underpayment of wages, exploitation of migrant workers and (in the case of China) bonded labour/servitude. We have assessed the residual risk in relation to our own Tier 1 suppliers to be low based on geography (including an assessment of countries considered to be at higher risk of modern slavery), the commodity purchased, supplier performance, the nature of the business transaction and the supporting structures, policies, programs and processes we have in place to help manage the risk.

## **The actions taken to assess and address those risks, including due diligence and remediation processes**

The Group maintains written policies, including our Supplier Code of Conduct, which strictly prohibits the use of slavery or human trafficking in our supply chain. Our Group's Code of Ethical Conduct expressly prohibits the use of underage, forced or bonded labour. We will not work with third parties who are involved in any such practices. The Code of Ethical Conduct was reviewed and updated in April 2021.

The Group has recently refreshed our Supplier Code of Conduct in April 2022. While the Code of Ethical Conduct is primarily an internal document to inform and regulate the actions of our employees, the Supplier Code of Conduct is primarily an external document applying to our suppliers. Under the Supplier Code of Conduct, our suppliers are expected to commit to all applicable laws, and regulations and our ethical principles, including a 'zero tolerance' policy when it comes to unethical business behaviour such as forced and child labour, prohibitions on the practice of slavery or human trafficking in the supply chain, and freedom of workers to form associations for collective bargaining. We work with our Tier 1 suppliers to ensure they fully understand and agree to their obligations under the Supplier Code of Conduct.

We are committed to the principles enshrined in International Labour Organization Conventions and the United Nations Convention on the Rights of the Child.

Our procurement policies, including our Supplier Code of Conduct, contain guidance for the

Group's procurement team on our values and appropriate business practices. We seek to ensure that our suppliers confirm their compliance with all relevant laws and regulatory standards in all countries in which we operate as part of our legal contract with them. We also encourage our suppliers to make the same conditions part of their business with other parties and contractors.

The Group has in place a whistleblowing system which encourages and enables employees as well as suppliers to raise confidentially (and anonymously if desired) any concerns or issues related to business conduct or activities, including in respect of modern slavery or human trafficking. This is in operation in all countries where the Group operates and is periodically reviewed, updated and promoted. Our whistleblowing policy explicitly protects everyone who makes a disclosure/report in good faith of suspected misconduct on reasonable grounds against reprisals of any kind. For the financial year ended 31 May 2022, we did not receive any complaints in across the Group via our Whistleblowing channels from either our employees or suppliers relating to modern slavery or human trafficking. Refresher training sessions for employees on our whistleblower policy and processes was conducted for our employees during financial year ended 31 May 2022. Additionally, all markets received training and completed the Code of Ethical Conduct Survey confirming their compliance with the code and policies including requirement to report all instances of suspected misconduct or breach of policies.

We seek to identify and do business with companies which have values and standards which are consistent with our own, including working to cascade these expectations throughout their own supply chain. In our dealings with our suppliers, the Group seeks to use its purchasing agreement templates which contain specific contractual terms requiring the supplier to:

- Not engage in any modern slavery activity, practice or conduct;
- Comply with all applicable laws in relation to modern slavery laws;
- Take all reasonable steps to ensure that modern slavery practices are not taking place in its business or supply chain;
- Immediately notify the Group if it has any reason to believe that it or any person in its supply chain is engaged in modern slavery practices or in breach or likely to be in breach of modern slavery laws;
- Maintain adequate records in relation to its supply chain and provide such records to the Group upon request; and
- Warrant that it is not aware of circumstances within its supply chain that would constitute modern slavery practices.

During Financial Year ended 31 May 2022, the Group implemented a Dow Jones supplier risk management software solution (**Third Party RiskCentre**). This integrated technology has helped the Group transform its documented policies related to modern slavery into effective institutionalised processes by enabling the Group to:

- Screen third parties against nominated risk categories;
- Assess risk via internal and external questionnaires
- Conduct enhanced due diligence

- Process risk ratings and implement mitigation activities with any suppliers of concern
- Monitor changes in risk levels on an ongoing basis; and
- maintain full audit trails.

To help embed Third Party RiskCentre, the Group has made changes to its processes and system so that set up of a new supplier profile in our payments system cannot be completed unless the new supplier has been screened via the Third Party RiskCentre solution.

The Group has also commenced retrospectively screening all existing suppliers via the RiskCentre Third Party solution.

### **Assessing the effectiveness of the Group's actions**

The Group reviews the effectiveness of its modern slavery program through periodic policy reviews, oversight of its procurement processes, monitoring for issues raised under its Whistleblowing Policy and Third Party RiskCentre and considering enhancements to its processes in the course of drafting its annual modern slavery statement.

Refresher training sessions for employees on our whistleblower policy and processes was conducted during financial year ended 31 May 2022.

For the upcoming year, the Group will focus on further embedding Third Party RiskCentre to ensure all suppliers have undergone screening and appropriate follow up assessment and remediation is actioned with any suppliers of concern. The Group is also considering scope and criteria for its next wave of third party supplier audits.

The information gathered from these actions will help inform our further steps in the modern slavery space.

### **Consultation and Approval**

The Group is managed by an executive leadership team with responsibility for managing our day-to-day business under the direction of our Board of Directors. This statement was prepared by the Group with consultation and input from managers responsible for the Group's operations and supply chains, including the procurement team and legal, governance and compliance team. It was then circulated to relevant members of the senior executive team, prior to being submitted for Board approval.

This Statement was approved by the Board of Directors of PZ Cussons plc on 21 July 2022.

**Jonathan Myers**  
Group Chief Executive  
PZ Cussons plc