



## **Modern slavery statement for financial year April 2023/ March 2024**

Creightons PLC & all its subsidiaries, recognises its responsibility to address and mitigate the risk of modern slavery and human trafficking in its operations. This statement is made pursuant to section: 54 of the Modern Slavery Act 2015 (Transparency in Supply Chains) and sets out the commitment to eradicating these abhorrent practices and describes the actions we have taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Creightons PLC & all its subsidiaries have a zero-tolerance approach to any form of modern slavery or human trafficking.

Creightons PLC & all its subsidiaries are committed to acting ethically and with integrity and transparency in all our business dealings. We are also committed to engaging with our stakeholders, customers, suppliers, and neighbours into putting effective systems and controls in place to safeguard against any form of modern slavery or human trafficking taking place within our business or our supply chain.

### Our Business

Potter & Moore Innovations Ltd, is a Creightons PLC subsidiary and the Creightons Group head office is located in Peterborough Cambridgeshire UK. Our business operates globally; selling toiletries to Worldwide markets and as such has suppliers in various countries all over the world.

### Our High-risk Areas

Creightons PLC & all its subsidiaries have considered that the high-risk areas are our suppliers outside of the UK and EU. This includes component suppliers, raw material suppliers, third party manufacturers, service providers and sub-contractors.

To mitigate risks where possible suppliers that we deal with in all countries, including the UK are required to complete our Supplier Self-Assessment form, which includes a section on Ethical compliance, Modern Slavery and Human Trafficking.

Our Far East suppliers are required to have had either a SMETA, BSCI ethical audit or Workplace Conditions Assessment audit and where possible be a member of SEDEX.

## Our Policies

Creightons PLC & all its subsidiaries operate a number of internal policies and procedures to ensure to our employees, stakeholders, customers, suppliers and neighbours that we are conducting business in an ethical and transparent manner. These include the following:

1. Modern Slavery and Human Trafficking Policy (POL 024). This policy sets out the organisation's stance on modern slavery.
2. Business Practice & Ethics Policy (P&P 029). This policy details the business goals and core values in adopting the highest ethical standards.
3. The Company & Human Rights & Stakeholders Policy (P&P 028). This policy details our salient human rights issues. While recognising that where risks to people's human rights are greatest, this would also be a risk to our business.
4. Anti-Bribery Policy (POL 018). This policy details that we will not tolerate any form of bribery. All our buyers have been trained in this policy and a copy of the policy has been sent to all our customers and suppliers.
5. Whistleblowing Policy (POL 019). We operate a whistleblowing policy so that all employees / stakeholders know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
6. Equal Opportunities and Diversity Policy (POL 011). This policy details our approach to our employees to ensure there is no discrimination.
7. Corporate & Social Responsibility and Ethical Compliance Policy (POL 017). This Policy explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

## Ethical Trading Initiative Base Code

In order to make our position clear to our own staff, our suppliers and any other affected parties, we follow the guidelines laid down within the Ethical Trading Initiative Base Code. Our customers and third-party audit companies conduct SMETA, Ethical and Workplace Conditions Assessment audits on us, on an annual basis. We are an AB member on SEDEX and audit reports can be reviewed by our customers and suppliers at any time.

## Our Suppliers

Creightons PLC & all its subsidiaries operate a supplier approval procedure and maintains an approved log of suppliers. Due diligence checks are carried out on all suppliers and agency worker providers before allowing them to become a preferred supplier / agency.

This due diligence includes an online search to ensure that the particular organisation has never been convicted of offenses relating to modern slavery, completion of the Supplier Self-Assessment form and on-site audits if required by 3<sup>rd</sup> party approved auditors, which include a review of working conditions.

Annual audits are carried out on the cleaning company we use and also agencies we use, ensuring their GLAA licence is in date and checking all information relating to any cleaner or agency worker is legally approved to work in the UK and within Creightons PLC & all its subsidiaries.

Our Modern Slavery and Human trafficking Policy forms part of our contract with all suppliers. All suppliers have been sent a copy of our policy and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery and human trafficking within their business
2. They hold their own suppliers to account over modern slavery and human trafficking
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract of a supplier at any time should any instances of modern slavery or human trafficking come to light

Agencies who provide workers are audited annually. Part of this audit also includes the checks they carry out to ensure modern slavery and human trafficking is not taking place.

### Training

Creightons PLC & all its subsidiaries regularly conduct training with all our employees, with additional emphases on our buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our employees have been trained in relevant policies to ensure they understand the Company's values when carrying out their job role.

Our suppliers have also been sent copies of our policies so that they understand that the business works in an ethical and transparent manner.


Our Performance Indicators

In understanding the effectiveness of the steps we are taking to ensure that slavery and / or human trafficking is not taking place within our business or supply chain, Creightons PLC & all its subsidiaries will check the following:

- **Right to Work.** We can confirm that all our employees have been checked and have the correct right to work documentation in place, which has been signed and dated confirming the information is correct
- **Agency Audits.** During the audits of the agency and their documentation we can confirm that all agency personnel supplied to the business have been checked to ensure they have the right to work, which has been signed and dated by the agency confirming the information is correct.
- **Reports of Slavery.** We can confirm that we have received no reports from employees, the public, or law enforcement agencies to indicate that modern slavery or human trafficking practices are taking place within our business or supply chain
- **Searchers of Suppliers.** Online searches of our suppliers have been conducted and we have not identified that any of our suppliers have been convicted of offenses relating to modern slavery and human trafficking
- **Auditing Suppliers.** Audits of suppliers have not identified any irregularities

Approval for this Statement

The Board of Directors has approved this statement.

Signed by Board Director: Martin Stevens Managing Director of Manufacturing		Date:1 April 2023
--	---	-------------------