

CREIGHTONS

CREATORS AND MANUFACTURERS
OF FINE ENGLISH TOILETRIES

Modern slavery statement for financial year 2019/2020

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.

We 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 and neighbours into putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

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

Our High-risk Areas

Creightons PLC & all its subsidiaries has 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 Assessment form, which includes a section on Ethical compliance, Modern Slavery and Human Trafficking.

Our Policies

Creightons PLC & all its subsidiaries operate a number of internal policies and procedures to ensure 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 and has been trained out to all our employees
2. **Whistleblowing Policy (POL 019).** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals
3. **Equal Opportunities and Diversity Policy (POL 011).** This policy details our approach to our employees to ensure there is no discrimination
4. **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 guide lines laid down within the Ethical Trading Initiative Base Code. Our customers and third party audit companies conduct SMETA and Workplace Conditions Assessment audits on us, on an annual basis. We are an AB member on SEDEX and the audit reports can be reviewed by our customers at any time.

Our Suppliers

Creightons PLC & all its subsidiaries operates a supplier approval procedure and maintains an approved supplier list. We conduct due diligence checks on all suppliers before allowing them to become a preferred supplier. 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, which include a review of working conditions.

Our Modern Slavery and Human trafficking Policy forms part of our contract with all suppliers 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 within their business

2. They hold their own suppliers to account over modern slavery
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 at any time should any instances of modern slavery come to light

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 Performance Indicators

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

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified
- Online searches of suppliers have not identified that they have been convicted of offenses relating to modern slavery
- Audits of suppliers have not identified any irregularities

Approval for this Statement

The Board of Directors approved this statement on 10 November 2019. Paul Forster Commercial & Finance Director is a Board Member.

Signed by: Paul Forster
Commercial & Finance Director

