

MODERN SLAVERY STATEMENT

We are committed to improving our practices to combat slavery and human trafficking. We recognise that slavery and human trafficking is a real yet hidden issue in our society. We will not tolerate slavery and human trafficking in our business or supply chain. The Company has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that any form of slavery is not taking place in our own business or supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under Section 54 of the Modern Slavery Act 2015.

We expect the same high standard from all of our contractors, suppliers and other business partners.

This policy applies to all persons working for us or on our behalf in any capacity for example but not limited to: employees at all levels, directors, officers, agency workers, volunteers, agents, contractors, external consultants, third party representatives and business partners.

This policy does not form part of any employee's contract of employment and we reserve the right to amend it at any time.

Responsibility for the Policy

Ultimately overall responsibility lies with Board Directors. However senior management also have responsibility for ensuring the policy complies with our legal and ethical obligation and that all those under our control comply with it.

The Company has primary and day to day responsibility for implementing this policy, monitoring it's use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure that they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to constructively comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

Compliance with the policy

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You must notify your Head of Department or a Company Director as soon as possible if you believe you suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible opportunity.

If you believe or suspect a breach of this policy has occurred or it may occur, you must notify your Head of Department or a Company Director or report it in accordance with the Whistleblowing Policy available upon request from the Human Resources department.

You should note that where appropriate and with the welfare and safety of local workers as priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices.

If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, you should raise it with your Head of Department or a Company Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment you should immediately inform your line manager. If the matter is not resolved, and you are an employee of the Company you should raise it formally using our Grievance Procedure available upon request from the Human Resources department.

Company structure

We are a non-food FMCG manufacturer and supplier to the retail industry. The business is split into two parts Minky Homecare and Alfresia/Vitinni/Fire Mountain. Our ultimate parent company is Vale Mill (Rochdale) Limited with our head office based in England.

Relevant policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Recruitment – we operate a robust recruitment policy, including only using reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. In addition, conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. Accept that job introduction fees are a business cost and will not allow these to be paid by job applicants. The Company will not use any individual or Company to source and supply workers without confirming that workers will not be charged a work finding fee. Ensure that labour sourcing, recruitment and worker placement processes are under the control of competent staff members.
- Whistleblowing – our whistleblowing policy ensures 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 reprisal.
- Health and Safety – this policy sets out our approach to ensure we provide a healthy working environment for our staff and contractors that work out of our premises.

Our supply chains

Our supply chains are based across the UK, Europe, China and the Far East and India. We buy raw materials for conversion in the UK and part components and finished goods from factories across the world. Our suppliers include, but are not limited to, suppliers of raw material (e.g., foam, scrim, cellulose), packaging suppliers (e.g., printed film, inserts, cartons), suppliers of part finished materials (e.g., printed fabrics) and suppliers of finished goods (e.g., airers, plastic goods).

We conduct due diligence on all suppliers assessed by our Quality and Purchasing Teams as critical and/or major to the business before allowing them to become one of our suppliers. This due diligence includes assessing any available regulatory licences and certificates, compliance with such regulatory bodies, checks to determine the financial stability of the supplier as well as carrying out supplier audits, where appropriate.

Further steps

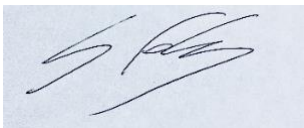
We intend to take the following further steps to combat slavery and human trafficking:

1. risk assess all new suppliers using the Global Slavery Index and ask them to certify that they have taken steps to eradicate modern slavery within their own organisation and supply chain;
2. notify all existing suppliers of our expectations and their obligations in relation to the prohibition of modern slavery;

3. incorporate anti-slavery and human trafficking obligations into procurement agreements and subcontracting arrangements on a risk assessed basis;
4. include appropriate measures in our due diligence processes for sourcing suppliers, subcontractors and acquisitions on a risk assessed basis;
5. provide training to relevant employees to ensure a high-level understanding of the risks of modern slavery and human trafficking as part of the induction process for all individuals who work for us and updates will be provided.
6. Participating in collaborative initiatives focused on human rights in general and slavery and human trafficking in particular Stronger Together or Ethical Trading initiatives.
7. Designate appropriate managers / supervisors to attend “Tackling Hidden Labour Exploitation” training
8. where appropriate we will include reference to the Modern Slavery Act 2015 in our policies and procedures. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Breaches of this policy

An employee who breaches this policy may be subject to disciplinary action which could ultimately result in dismissal. We may terminate our relationships with other individuals and organisations working on our behalf if they breach this policy.

A handwritten signature in black ink, appearing to read 'S Foley', is placed on a light blue rectangular background.

Steve Foley
Managing Director
8 April 2021