



# Modern Slavery Statement 2022-23



## **Introduction**

This statement is made in line with the UK Modern Slavery Act 2015 and sets out Karium's actions to ensure modern slavery is not taking place in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2022 to 31 March 2023.

As part of the FMCG sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Karium is absolutely committed to preventing slavery, servitude, forced and compulsory labour and human trafficking in its corporate activities and supply chains.

## **Organisational structure and supply chains**

Karium is a UK based FMCG company operating in the personal care industry with a presence in haircare, skincare and body care categories. We are largely a Sales and Marketing organisation. We own the brands in Inecto, Cuticura, Soft & Gentle, Pro:Voke, Aapri and we also exclusively distribute P20 and Perspirex in the UK.

We work with all major mass market retailers, grocers and online including Boots, Amazon, Superdrug, Tesco, Sainsbury's, Morrison's and Asda as well as all of the major discounters. In addition, we work with pharmacies, wholesalers and the convenience sector in the UK. We also export some of our brands and products internationally, our biggest markets are Europe and Australasia.

Our manufacturing operations are outsourced to various third party suppliers primarily in the UK, but also in Europe and Asia. Similarly, our warehousing and logistics are also outsourced to a third party supplier in the UK.

All our employees are based in the UK and are either office or home based roles.

## **Countries of operation and supply**

We are based in Bracknell (Berkshire) and the company does not have any physical presence or offices outside of the UK. As noted above, we do have third party suppliers outside of the UK i.e. in Europe and Asia.

## **High-risk activities**

Having reviewed our business operations and relationships, we believe that the area of highest modern slavery risk is in the supply chain supporting the procurement of goods and materials for our products particularly where those suppliers are in high-risk countries and/or manufacturing goods specifically in Asia.

We do not consider any activities carried out in our offices as high risk. Similarly, we do not believe that activities carried out in any of our manufacturing supplier locations or third party warehouse are at a risk of modern slavery as our partners are reputable and we have had a long and successful business relationship with them. Also all our manufacturing suppliers are accredited (e.g. ISO 9001, GMP, ISO 14001, BRC).

## **Due diligence**

Karium carries out due diligence on suppliers in high-risk areas and this ensures that we only select suppliers who comply with our high standards and policies.

We insist that our suppliers and any of their sub-contractors as a minimum comply with national and other applicable law, but additionally, as recommended by Sedex, we support our suppliers to comply with the Ethical Trading Initiative Base Code, which may afford greater protection and which affirms that:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

### **Relevant policies and processes**

The company operates the following policies and processes to enable prevention of slavery and human trafficking in its operations:

- **Whistleblowing policy:** Karium has a Whistleblowing Policy which encourages employees to report any concerns including any related to modern slavery/trafficking and child and forced labour
- **Recruitment of Agency workers:** We use only specified, reputable employment agencies to source agency workers and always verify the practices of any new agency before accepting workers from them. This involves ensuring that the wages paid by the agency to the worker are at least in line with the national minimum wage and other benefits such as holidays are as per legislation. We also ensure that our agency workers have the same rights as our permanent employees with regards to policies/practices such as time off for antenatal care, access to all office facilities, equal pay, working hours, etc.
- **Health and Safety policy:** We have a health and safety policy in place that ensures a safe and healthy working environment for all its employees, including agency workers.
- **General Employment practice:** We ensure compliance with legislation regulating employment, working conditions and employee/worker rights.

### **Training in 2023/24**

During the year 2023/24 training will be provided to those teams who have direct responsibility for relevant supply chain management and other teams and personnel as necessary. This will include:

- Ensuring all employees are aware of this Modern Slavery statement.
- Ensuring all employees are sent a summary of the requirements of the Modern Slavery Act 2015.
- Ensuring employees who have responsibility for the supply chain have more detailed training on how to recognise and report slavery, servitude, forced and compulsory labour or human trafficking.
- Ensure all employees have read and understood the Company's Whistleblowing policy.

## Looking Ahead

We will continue to review our modern slavery statement annually and continually identify any potential risk with suppliers.

We plan to implement a process that all suppliers which we class as high risk must:

- Complete a Modern Slavery Act Due Diligence questionnaire which covers their governance, policies, training and supply chains management processes; and
- Provide a full and complete list of all internal sites they are proposing to commission goods from on behalf of Karium on an annual basis.

All sites will then need to complete a questionnaire to ensure ethical standards and full transparency are maintained.

Should a supplier fail or refuse to provide the information required or meet Karium's expectations, this may result in Karium not entering into a relationship with them or terminating any current relationship.

## Board Member approval

This statement was approved on 16<sup>th</sup> May 2023 by the Company's Executive Chairman and Managing Director who would review and update it annually.

**Executive Chairman's signature:**

**Executive Chairman's name:** Richard Otley

**Date:** 5/16/2023

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*Richard Otley*  
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**Managing Director's signature:**

**Managing Director's name:** Lee Gelderd

**Date:** 5/15/2023

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*Lee Gelderd*  
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