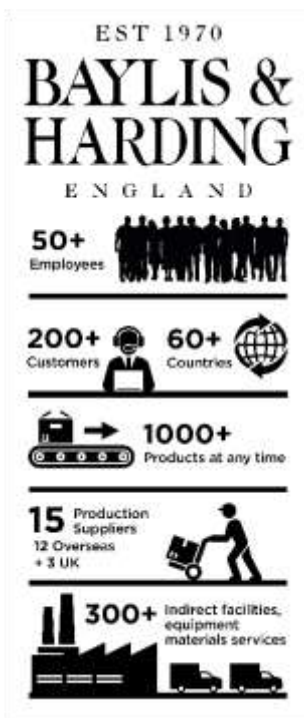


Modern Slavery and Human Trafficking Statement for the year ended 31st May 2022

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Baylis & Harding has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the Company has taken and will take to ensure that slavery and human trafficking is not present within our business or supply chains.

This is Baylis & Harding's fifth annual Modern Slavery Statement



OUR BUSINESS and OUR SUPPLY CHAINS

made Baylis & Harding one of the fastest growing, award-winning, multi-channel bath, body and gift manufacturers operating in the UK market.

Our values are the heart and personality of our business. They are what makes us different from our competitors, they are what has made, and will continue to make, our Company a success. They are Baylis and Harding. They are “the way in which we do things” and this includes our commitment to ensure that slavery and human trafficking is not taking place in our business or in our supply chains.

We are a family owned business based in UK with carefully selected manufacturing partners both in the UK and Overseas and are proud to supply our products to over 60 countries around the world.

OUR POLICIES

We operate several internal policies to ensure we conduct business in an ethical and transparent manner. These include

- 1. Corporate Social Responsibility Statement**
This details the core principles by which we operate our business.

The intention of this Policy is to communicate our commitment that we operate our business in a transparent and ethical manner including a zero-tolerance approach to any form of Modern Slavery within our supply chain.
- 2. Anti-Slavery & Human Trafficking Policy**
This policy has been developed to reflect and communicate both internally and externally our commitment to implement and enforce effective systems and controls in order to identify and address any instances of modern slavery or human trafficking within our supply chains.
- 3. Recruitment**
We operate a fair and open recruitment policy, including 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.
- 4. Employment**
Our employment policies as detailed in our Employee Handbook and associated employment contracts are in full compliance with UK legislation and ensuring employees are provided with good working conditions, fair treatment and reasonable rates of pay; and respect workers' human rights.
- 5. Whistleblowing Policy**
This encourages all employees to raise confidentially any concerns relating to business conduct or activities.
- 6. Global Sourcing Agreement**
Over the past four years we have continued to enhance our Global Sourcing Agreement which includes clear obligation on suppliers to comply with the Modern Slavery Act. We have also included the requirement that suppliers must not knowingly use any suppliers that do not comply with our requirements and are to advise Baylis & Harding if they become aware of Modern Slavery within their supply chain.

DUE DILIGENCE AND ASSESSMENT OF RISK

At Baylis & Harding we pride ourselves in trading ethically and maintain the measures built into our business process to address Modern Slavery within our supply chain. On an annual basis we conduct a formal Risk Assessment mapping all suppliers, agents, distributors and customers and assessed potential risk based on both industry/sector and geographical risk. We have also ensured new suppliers brought into our supply chain during this time have been subject to full supplier approval process.

Based on our assessment and understanding of our supply chain we recognised that our biggest exposure to Modern Slavery is within in our manufacturing supply chain, and as such we require all manufacturing suppliers to be members of SEDEX and undergo SMETA audits on an annual basis.

Baylis & Harding have been a member of SEDEX (www.sedexglobal.com) since 2009. This is home to one of the world's largest collaborative platform for buyers, suppliers and auditors to store, share and report on information quickly and easily. The platform is used by more than 40,000 members in over 150 countries to manage performance around labour rights, health & safety, the environment and business ethics.

All Baylis & Harding Tier 1 Manufacturing suppliers are registered on SEDEX and have annual SMETA audits however we have enhanced our requirement for all manufacturing sites to complete 4 tier audits from 2019.

A review of audit compliance and conformance has been conducted as part of annual Modern Slavery Risk Assessment and findings will be communicated to suppliers to action and maintain continuous improvement in this area.

It is a requirement that all agencies engaged in the provision of temporary staff to Baylis & Harding are licensed members of the Association of Labour Providers and for these agencies, we have introduced an audit programme to review their internal policies and commitment to address Modern Slavery.

During the current year we shall continue to place additional focus on agents/ distributors and employment agencies to enhance communication of our requirements and obligations under the Modern Slavery Act 2015.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We shall work with all suppliers, agents, distributors and agencies to improve their ability to identify and prevent Modern Slavery and Forced Labour Reports shall continue to be used as a performance indicator.

We shall conduct a documented annual Risk Assessment designed to evaluate risk potential and establish actions for continual improvement.

We shall measure our effectiveness in combating Modern Slavery and Human Trafficking by evaluation of Risk Assessment findings for Tier 1 Manufacturing suppliers on an annual basis.

TRAINING

To ensure a higher level of understanding of the risks of Modern Slavery and Human Trafficking, we will provide annual training to all Baylis & Harding employees based both in the UK and around the world.

In addition to this key staff involved in assessment of risk and formulation of policy shall maintain knowledge of modern slavery risks and identify opportunities for external training as appropriate.

We understand that Modern Slavery risk is not static, and we are committed to continue our approach to identify and mitigate this risk in the year ahead.

This statement has been approved by Baylis & Harding plc on the 30th November 2022.