

People Against Dirty – Statement on Modern Slavery

Introduction

This statement sets out the actions of People Against Dirty Holdings Limited and its subsidiaries and relevant group companies in the UK (“People Against Dirty”) to understand all potential modern slavery risks related to its business and put in place steps that are aimed at ensuring there is no slavery or human trafficking in its own business and supply chains. To that end, People Against Dirty seeks to ensure that quality and safety standards are maintained throughout our supply chain and that workers are treated fairly and in accordance with all applicable laws.

Structure of our business

People Against Dirty make cleaning and personal care products which are sold in supermarkets, retailers and online around the world. The majority of our products are manufactured in the US and Europe. Our products and packaging contain a number of ingredients and materials from global suppliers.

Supply chain

People Against Dirty have undertaken the following efforts to help prevent slavery and human trafficking in our supply chain.

Supplier Code

As part of the procurement process, key suppliers are contractually obligated to comply with People Against Dirty’s Code of Conduct (“Supplier Code”), under our supply agreements. The Supplier Code addresses the following labour and human rights issues, among others:

- Minimum wage and maximum work hours requirements: suppliers must pay employees at least the minimum wage and not require employees to work more hours than permitted by local law
- Prohibition of forced labour: suppliers will not use forced or compulsory or prison labour to manufacture products and no employee will be forced to work against his or her will
- Prohibition of child labour: suppliers will not use child labour, will not engage in any practice inconsistent with the rights set forth in the Convention on the Rights of the Child, the International Labour Organization, and Minimum Age Convention (C138-1973)

Suppliers must also submit to audits or inspections as required by People Against Dirty to certify their respective compliance with the Supplier Code which happen on a periodic basis. We have not yet begun conducting independent, unannounced audits of third-party suppliers, nor have we used a third party to verify the risks in our supply chain. If we believe the Supplier is in breach of the Supplier Code, having applied a risk-based analysis, we require that the supplier take the appropriate remedial actions. If the issue is serious enough, or if appropriate corrective actions are not taken in a timely fashion, People Against Dirty will switch our source of supply to a supplier who is assessed not to be a risk.

Risk review

People Against Dirty periodically reviews its supply chain and supplier base to determine the level of risk associated with each supplier with respect to slavery and human trafficking based on its

knowledge of their industries and their country of origin. A new supplier engagement platform has been adopted and we aim in the coming year to implement a more formal risk review and mechanism for measuring the effectiveness of our Supplier Code.

Training

People Against Dirty ensures that key employees are aware of the Supplier Code and the risk issues such as forced or child labour as part of our procurement process. Key people at the business have undergone specific training on the Supplier Code and modern slavery risks. In particular, this training focused on encouraging effective recognition of the risk areas.

Internal Policies

The People Against Dirty Internal Code of Conduct (“Code of Conduct”) commits the business to the following:

- Protection of employees from the use of any forced, compulsory, or child labour by or for People Against Dirty
- Ensuring strict compliance with all applicable laws relating to human rights and labour standards


People Against Dirty also has a whistleblowing policy and Code of Conduct compliance hotline through which concerns can be reported anonymously as permitted by local laws. The hotline enables any person with a concern about a matter relating to our Code of Conduct to report it 24 hours a day, seven days a week.

People Against Dirty shall look at improving awareness of this Code of Conduct for its employees and the issue of slavery and human trafficking in the next financial year. Key external facing employee groups at the business have been trained this year and further awareness raising activities will take place across the wider employee population during the next financial year.

Commitment

People Against Dirty believes that the activities above will promote the goals of the Modern Slavery Act 2015 and help prevent slavery and human trafficking in our supply chain.

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 for the financial year up to 30 June 2020 and has been approved on 17 December 2020 and will be reviewed and updated annually.



Audrey Ditter, Director of People Against Dirty Holding Ltd