

DARE

**TO SET THINGS
IN MOTION.**

MODERN SLAVERY STATEMENT

01/05/2020
GRP-POL-129
Version 2

WEDARETOGETHER 

INTRODUCTION

This Statement, which is pursuant to Section 54 of the UK Modern Slavery Act 2015, is covering the Ontex Group NV and its principal trading companies which include Ontex Healthcare UK Limited and Ontex Retail UK Limited. It is our second statement.

The Ontex Group is committed to upholding human rights. In this Statement we set out the actions taken by Ontex and our plants during the financial year 2019 to drive out acts of modern day slavery and human trafficking from within our own operations and in our supply chain.

ABOUT THE ONTEX GROUP

In 1979 Ontex was launched in Belgium and we are now a leading international producer of personal hygiene solutions in baby, feminine and adult care. Globally, we are an international business employing 10,000 employees and have with offices and manufacturing plants in Europe, North Africa, Australia, the Middle East and the Americas. We have over 200 raw material & packaging suppliers. 26% Of them are located in high-risk countries.

OUR OWN OPERATIONS

Policies and Compliance:

All employees are issued with contracts of employment and they are expected to comply with our [Code of Ethics](#). Our Code of Ethics is available on the corporate website (www.ontex.com). In addition, in 2017, we introduced our first formal [Human Rights Policy](#). Our Human Rights policy contains sound due diligence and risk assessment processes that enable us to quickly identify any potential human rights risks in our operations. We conduct regular internal and third party social audits to understand any imminent or actual risks.

Training:

Our employees were trained on the Code of Ethics on its introduction; employees new to the Group since its introduction are asked to read the Code and agree to it. We organise employee specific training programmes and send regular communications to employees on various topics covered in our Code of Ethics. These are designed to underpin the Code of Ethics ensuring adherence to our values. Additionally, a communications plan on the Business Social Compliance Initiative (BSCI) expectations has been implemented as part of the social accountability system which operates in most of our plants.

Through our employee induction process we raise awareness of the different channels for raising concerns about suspected unethical behaviour or other breaches of our Code of Ethics. These channels include reporting misconduct to the line manager, local person of trust, local compliance co-ordinator, Group compliance, Global Internal Audit Manager or calling an externally and independently operated, confidential Speak Up line.

Audits:

12 Of our plants are in scope of a third party social audit scheme. In 2019 Business Social Compliance Initiative (BSCI) audits took place in 7 of our sites. All of them scored a B or better. These audits entail staff interviews which are conducted by independent external auditors and focus of working conditions & human rights matters, including forced labour.

Next to the third party audits, we set up a new internal audit program called Radar Chart program. The Radar Chart program is an internal audit program carried out by our own sustainability and quality team. Over a period of three days, two internal auditors check a site's compliance with applicable regulations and company policies and use the opportunity to share best practices between sites, including a chapter on social accountability.

OUR SUPPLY CHAIN

Risk Assessment:

We use the amfori BSCI platform to follow up on those companies of our supply chain which we have categorised as high-risk; focusing at our direct spend suppliers. These actions enable us to continually identify and monitor those areas deemed to give rise to the greatest risk of modern slavery so we can tailor processes to better protect and support workers.

Due Diligence and Auditing:

In 2018 we reviewed & updated our Supplier Code of Conduct that we ask our suppliers to sign before entering into a contract with us. The [Supplier Code of Conduct](#) clarifies our global expectations with regard to (i) business integrity, (ii) human rights, (iii) safety & health and (iv) environmental sustainability. We expect our suppliers to share the ethical, social and ecological standards which are expressed in this Supplier Code of Conduct and to replicate these standards further down the supply chain.

Our [Ethical Sourcing Requirements](#) aim to further elaborate on the social audit requirements towards our suppliers which are mentioned in our Supplier Code of Conduct, zooming into the scope of the supplier social audits, accepted audit schemes & results. We allocate audits based on the risk level of the country in which a supplier facility is located so we can drive the biggest impact in our supply chain.

Continued failure to comply with our Supplier Code of Conduct can lead to the suspension and, ultimately, termination of the contract.

In 2019 we rolled out the ethical sourcing requirements and are working on the first consolidation of results.

LOOKING TO THE FUTURE

Our continued efforts to drive out further modern slavery, enforced labour and unethical working practices within both our operations and those of our supply chain within the next year include:

- Training – we are continuing our employee training programmes so they provide further guidance and support to staff on the broader human rights & working conditions topics, including modern slavery issues. We also plan to roll-out a Code of Ethics campaign (e-learning and workshops) end 2020 and in 2021.
- Auditing – we continue working on the roll out of the third party social audit scheme for suppliers in risk areas as identified by our annual mapping exercise. In 2020 we'll start reporting on the progress of third-party audits as the first audit year will be finished.
- Review – policies will be kept under review and updated where necessary to reflect developments in our processes designed to tackle modern slavery and forced labour. We

also plan an upgrade of our Code of Ethics in 2020.