



## MCBRIDE PLC

### ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT 2021

This statement, pursuant to the UK Modern Slavery Act 2015 (the Act'), is our fifth under the Act and relates to the financial year ending 30 June 2021. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery in our supply chain. We expect the same high standards from our suppliers.

#### OUR BUSINESS

McBride is the leading European manufacturer and supplier of contract manufactured and private Label products for the domestic, household and professional cleaning/hygiene markets.

McBride was established in 1927. From its historic UK base, the Company has grown both organically and by acquisition, expanding its range of products and its manufacturing base into key continental European markets and Asia Pacific. The Company listed on the London Stock Exchange in 1995.

McBride has c.3,300 employees and operates in 12 countries. In 2021, the Group had a global annual turnover of £682.3m. You can read more about our business in our annual report at [www.mcbride.co.uk](http://www.mcbride.co.uk).

#### OUR SUPPLY CHAINS

We are one of the largest European buyers for several of the raw and packaging materials that we source, including surfactants, salts, polymers, enzymes, HDPE, triggers and paper packaging. We also buy a broad range of indirect goods and services across our business.

Our Group purchasing team, which covers all subsidiaries, aims to be best-in-class and buys centrally out of two major locations (Belgium and the UK), supported with offices in both Poland and Hong Kong

We are open to new ideas, concepts and learning how we can do things better. We regard suppliers as partners in our drive for quality, innovation and efficiency.

Our suppliers help us develop new products, achieve efficiency, and serve our customers better. In turn, we aim to work on a long-term basis with our suppliers to help them develop their businesses as well as ours.

We seek to establish mutually beneficial relationships with all our suppliers and encourage them to match our high standards in respect of quality, product safety, working and trading practices, health and safety and environmental protection and human rights.

#### OUR POLICIES

We take the issue of human rights seriously and will continue our efforts to strengthen our policies and management systems in this area. Our employee policies are set locally to comply with local law within the overall Group framework and we monitor the employment practices of our supply chain.

#### Supplier Code of Conduct

Our Supplier Code of Conduct (the 'Code'), which sets out the standards of behaviour we expect from all of our suppliers, is provided to all new suppliers on commencement of our business relationship. As a minimum standard, we adhere to the provisions of the Ethical Trading Initiative (ETI) and require every supplier to ensure that our Code of Conduct is complied with coupled with adherence to national and other applicable law.

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The Code is published on our website. Any breach of the Code, or any of our other corporate policies, may result in the termination of a business relationship with a supplier.

#### Our Whistleblowing Policy

Our Whistleblowing Policy is intended to act as a deterrent to fraud or corruption or other serious malpractice; it is also intended to protect the Group's business and reputation.

We recognise that employees will usually be the first to know when someone inside or connected with an organisation is doing something illegal, dishonest, dangerous, or unethical. This may relate to the actions of third parties such as customers or suppliers. We do not believe that it is in anyone's interests for employees with knowledge of wrongdoing to remain silent. We therefore welcome the opportunity to address, at the earliest opportunity, any potential for something to go badly wrong in the business and we actively promote openness within the business so that we are better able to deter wrong doing and pick up potential problems early. Colleagues are encouraged to report genuine concern about serious malpractice to either their line manager or independently to the Company Secretary.

McBride is currently in the process of implementing an externally facilitated, confidential Whistleblowing reporting line that will give employees confidence that any reports will be anonymous and confidential.

Our Whistleblowing Policy is published on our website.

#### Our Business Ethics Policy

We have a strong code of ethics and expect all colleagues to behave with honesty, discretion, integrity and respect for all stakeholders.

Our code of business ethics is fundamental to our ways of working and is underpinned by our corporate policies and procedures. We are committed to carrying out business fairly, honestly and openly and do not act in any way which might reflect adversely upon the integrity and goodwill of McBride.

Our Business Ethics Policy is published on our website.

### **GOVERNANCE**

The Board is responsible for slavery and human trafficking. The Board and its committees review our approach and policies in this important area and address specific issues if they arise. Day-to-day responsibility sits with the Chief Executive Officer. An ESG working group, chaired by the CEO, has also been established which looks after many areas in relation to ESG, including slavery and human trafficking.

### **SUPPLIER ADHERENCE TO OUR ETHICAL STANDARDS**

We have zero tolerance to slavery and human trafficking. We do not knowingly work with companies or individuals that infringe the law or endanger our reputation.

Our Anti-Slavery Policy forms part of our standard terms and conditions with suppliers and they are required to confirm that they have read and understood our policy and that they will comply with our standards.

We employ purchasing procedures that, where possible, select suppliers on the basis of specification, quality, service and economic factors and favour those who operate in an ethical and socially responsible manner.

### **OUR DUE DILIGENCE PROCESS FOR SLAVERY AND HUMAN TRAFFICKING**

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McBride takes the following steps to address modern slavery risks in the supply chain:

1. Third Party Audits

We carry out third party ethical audits which are run under the Sedex System (the Supplier Ethical Data Exchange) wherever possible or, alternatively, under a specific retailer's own system. All audits conform with the ETI.

2. Site Audits

Our sites are independently audited at a frequency determined by risk and we maintain full data disclosure under the Sedex System for all sites regardless of audit frequency. Across our Asia sites we visit our key suppliers at least 2-3 times per year and our teams are in daily contact with their representatives. We also conduct pre-shipment checks to ensure that the quality of the supplies is in line with our required standards.

3. Site visits

Our sourcing staff across our Asia sites perform a site visit of each supplier, to conduct an audit of their premises, general quality, ethical standards, and check their ownership and financial credentials before we commence any business.

4. Due diligence questionnaire

In 2019 we rolled out a further enhanced supplier due diligence questionnaire to provide us with assurance that our suppliers are operating in a way that meets our high ethical standards.

## **TRAINING**

It is a responsibility of all managers to ensure that McBride policies are properly communicated, understood and applied. Managers are also responsible for undertaking full investigations into suspected breaches of McBride policies, rules and guidelines. This may involve disciplinary action where necessary and appropriate.

Employees are encouraged to advise their managers as soon as possible where they either suspect or believe there has been a breach of the Group's social & ethical standards. Any such communication will be handled confidentially and may be registered anonymously if the employee so desires.

It is a requirement of employment with McBride that all employees read, understand and comply where legally required with all Group policies that are relevant to their role.

## **NEXT STEPS**

We continue to take steps to improve our due diligence processes to ensure that there is no slavery or human trafficking in our supply chains. We are increasing the use of employee engagement surveys to consult with colleagues more frequently. It is anticipated that the results from the survey will help our internal audit and HR teams to identify behaviours and practices that could lead to a failure of ethics, controls or governance before they occur. This will allow us to identify and hopefully rectify some of the key risks in our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Anti - Slavery and Human Trafficking Statement for the financial year ending 30 June 2021.

Signed

Chris Smith, Chief Executive Officer

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McBride Plc  
Date: 15 December 2021

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