



MODERN SLAVERY STATEMENT

Introduction

This statement sets out Cornelius Group plc actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Cornelius recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing it in its corporate activities and to ensuring that its supply chains are also free from slavery and human trafficking.

Organisational Structure and Supply Chains

This statement covers the activities of Cornelius Group plc

Cornelius purchases raw materials for the Care Products, Health & Nutrition, Industrial sectors and its manufacturing division from around the world, mainly from, but not limited to, China, India, USA and Europe.

Cornelius has regional offices in UK, Poland, France and Russia and employs local representatives in China and India.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

All new potential suppliers for the Care Products, Health & Nutrition and Industrial sectors are subject to a risk assessment including ethical performance based on SA 8000. Higher risk suppliers are audited either by a member of the Cornelius Quality and Regulatory Team or by using local representatives. Suppliers must complete a self-audit form and evidence is expected on any certification or standards that are claimed – e.g. ISO 9000, BRC etc.

All new potential suppliers for the manufacturing division must complete a supplier qualification form and are asked to confirm their certification status with regards to SA8000 and other quality standards as well as the suppliers position on certain environmental, social and ethical policies. Evidence of certificates is requested initially and at the expiry of the certificate.

Responsibility

The Cornelius Board of Directors are responsible for the organisation's anti-slavery initiatives by ensuring that the company policies are reviewed regularly using the expertise of the Quality and Regulatory Team where necessary. All new employees are informed of the company's commitment on Corporate Social Responsibility and specifically on the risks of trading with companies that have not been audited and formally approved.

Relevant Policies: The organisation operates the following policies that describes its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

1. **Whistle blowing policy:** The organisation encourages all employees, customers and key stakeholders to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistle blowing policy is designed to make it easy for employees to make disclosures, without fear of retaliation.
2. **Employee code of conduct:** The organisations code of conduct makes it clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
3. **Supply chain code of conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are asked to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their employees' working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
4. **Due diligence:** The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisations due diligence and reviews include:
 - Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking evaluating the modern slavery and human trafficking risks of each new supplier.
 - Reviewing on a regular basis all aspects of the supply chain, based on the supply chain mapping.
 - Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified.

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the modern Slavery Act 2015. As a result, the organisation is:

- Continuing to develop its system for supply chain verification, whereby Cornelius evaluates any potential supplier before they enter the supply chain.
 - Reviewing its existing supply chains whereby Cornelius evaluates all existing supplier.
5. **Training:** The organisation requires all employees within the organisation to read the 'Modern Slavery Awareness' training and complete a training record to show they have read and understood.

The organisations modern slavery awareness covers:

- What is modern slavery
- Human trafficking
- Forced labour
- Debt bondage
- Child labour, child work & child slavery
- Slavery in the supply chain

Board Member Approval

This statement has been approved by the organisations board of directors who commit to review and update it annually.

Name of board member: Darren Spiby

Title: CEO

Signature:

A handwritten signature in blue ink, appearing to be 'D Spiby', written over a light blue circular stamp.

6th March 2018