



Modern Slavery Statement

Approved by the Board on 13 August 2022

Overview

Flomak stands against slavery and human trafficking. We recognise that modern slavery is a global issue and that no economy or industry is immune to this. We believe in partnering with others who share our values and understand the importance of always conducting business ethically.

In line with our Code of Conduct, Corporate Policies and under the UK Modern Slavery Act (2005), this document describes our steps to combat slavery and human trafficking.

Organisational Structure and Supply Chain

With manufacturing operations in numerous countries and locations, with more than hundreds of employees, we provide safety & healthcare products, where millions of healthcare professionals and patients rely on us; performance apparel to international brands, print solutions and materials to world-leading brands, as well as industrial chemicals for textile and wood processing industries.

Our sustainable practices throughout our supply chain support a healthier planet and build stronger communities to ensure our business thrives for decades to come.

For years, we have developed our business to a more sustainable approach every year.

Flomak's **Code of Conduct** and **Human Rights in Employment Policy** establishes the company's expectations and creates accountability for our people regarding human rights and other ethical concerns.

Similarly, we have published "**Supplier Social Compliance Standards**" aligned with the **ILO's Declaration of Fundamental Principles and Rights At Work, Ethical Trading Initiative's (ETI) Base Code, UN Guiding Principles on Business and Human Rights**, which set forth our principles and procedures to hold suppliers, employees and contractors accountable for combating forced labour and human trafficking. All Flomak associates are expected to comply with our **Code of Conduct** which explicitly forbids forced or involuntary labour in any of our locations or in the operations of facilities that produce goods for us. Violation of our Code of Conduct by an associate can result in disciplinary action, including termination of employment. Also, contracted factories are prohibited from engaging subcontractors to produce Flomak products without the written permission of Flomak.

We recognise that modern slavery may affect our people and supply chain more where the following risk factors are present:

- Migrant labour use
- Vulnerable workers such as refugees and young workers
- Temporary, daily or contract worker use

We hold our contracted factories to the same standards of social responsibilities found in our facilities to prevent the occurrence of any modern slavery in the workplace. As such, we evaluate potential contracted factories against our standards and require them to agree to

Flomak's **Code of Conduct** and **Human Rights Policy** before entering our supply chain. Our **Terms of Engagement** require contracted factories to conduct business in full compliance with all applicable laws, rules and regulations, including those relating to modern slavery.

Due Diligence

Flomak has systems in place to:

- Identify and monitor potential human rights risks in our operations and supply chain
- Mitigate the risk of modern slavery occurring in our supply chains
- Provide access to grievance mechanisms without fear of retaliation to employees and third parties

We will not knowingly support or deal with any business involved in slavery or human trafficking. We have zero tolerance for slavery and human trafficking, and we expect all those in our supply chain and contractors to comply with our values.

Factory Social Compliance Audits

According to our **Factory Social Compliance Program**, our suppliers are identified through a risk-based approach to determine which will be subject to our audit requirements on an annual basis. Auditing resources are directed to areas with the most significant risks to identify gaps and opportunities for improvement in existing factories. These include working hours and wages, occupational health & safety, discrimination, freedom of association, child labour, and forced labour.

Before conducting business with Flomak, each contracted factory must undergo a **Factory Social Compliance Audit**.

Our on-site audit process includes scheduled and unannounced audits by our Professional Consultants or Third-Party Audit Companies. We inspect for evidence of health and safety concerns, wage and social compliance, forced labour and human trafficking, child labour issues, harassment-free workplace policies and environmental issues.

To receive an "accepted" rating, a factory must not have any serious health, safety or labour issues in its facility. A factory receiving an accepted rating is audited annually. A factory receiving a "developmental" rating may still produce our products. However, a follow-up audit will be scheduled after six months, and the factory is expected to remediate issues noted in the corrective action plan. A factory with persistent safety, health or labour issues that fails to remediate the problems acceptably will be rejected as our supplier and unauthorized to supply product for Flomak.

Under our **Factory Social Compliance Audit Program**, contracted factories must allow Flomak representatives full access to production facilities, employee records and employees for confidential interviews with monitoring visits.

Flomak generally uses **Sedex Member's Ethical Trade Audit (SMETA)** audit standard, **Amfori BSCI** System or our Internal Social Compliance Auditing System to identify the areas of improvement in corporate social compliance.

To measure the effectiveness of steps taken, we track the types of non-conformances identified and KPIs for relevant procurement and supplier management staff linked to those metrics.

Training on Modern Slavery

Flomak provides basic training within social compliance training, human trafficking and forced labour for our employees and managers and those of suppliers.

This training can be received online as well as on-site given by our consultants.

All our employees and managers are trained every year on Modern Slavery. Our 1st level supply chain was trained in **2021**. We are committed to cascade this training to all our supply chains.

Remediating Findings

We work with the suppliers to remediate and verify that the non-conformance findings identified in audits are resolved. If the remediation doesn't work, we take appropriate steps to exit those suppliers after a timeline is given to suppliers.

Grievance Mechanisms

Flomak is committed to fostering dialogue and communication through multiple channels, including our Open Door Policy, Yearly Surveys, Suggestion Box System and our etik@flomak.com e-mail as well as our +90 212 422 1351 Helpline. This Helpline is a free, confidential way for anyone to seek guidance, ask a question or raise a concern.

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