

## McBride plc

### Anti-Slavery and Human Trafficking Statement 2024

This statement has been published by McBride plc (the “**Company**” and, together with its subsidiaries, “**McBride**” or the “**Group**”), pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the “**Act**”), is our eighth under the Act and relates to the financial year ended 30 June 2024.

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 Group 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. 3,695 employees<sup>1</sup> and operates in 14 countries. In its financial year 2023/2024, the Group had a global annual turnover of £934.8m. 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, high density polyethylene, 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, efficiency, sustainability and safety.

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 our own.

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, 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**

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<sup>1</sup> Includes employees, third-party contractors, consultants and agency workers. Figure given as at 30 June 2024 (see page 2 of the Company’s 2024 Annual Report and Accounts).

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 is complied with, coupled with adherence to national and other applicable laws.

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.

### **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 wrongdoing and pick up potential problems early.

In addition to local reporting channels, McBride has an externally facilitated, confidential whistleblowing reporting line that gives employees confidence that any reports will be anonymous and confidential.

Our Whistleblowing Policy is published on our website.

### **Business Ethics Policy**

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

Our Business Ethics Policy 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. In the course of the financial year 2024/2025, we plan to replace the Business Ethics Policy with a Code of Ethics and Business Conduct. We believe this overarching document will build on the Business Ethics Policy, enhance our broader policy framework and be more engaging for our workforce and others that we expect to comply with it.

### **Governance**

The Board is responsible for monitoring our slavery and human trafficking risks and mitigation measures.

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. Until recently, an ESG working group, chaired by the CEO, managed risk and governance in relation to ESG, including slavery and human trafficking risk in our supply chain. This working group has recently been replaced. A Sustainability Committee, again chaired by the CEO, provides oversight in relation to environmental issues. Oversight in relation to social and governance issues is provided by the Group’s Executive Committee.

## **Supplier adherence to our ethical standards**

Slavery and human trafficking are unacceptable. We will take appropriate action if we become aware that any companies or individuals that we work with are infringing the law or endangering 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**

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

### *1. Third party audits*

We have clear and robust policies that all suppliers must comply with as a condition of doing business.

### *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 two to three 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 new supplier. This is to conduct an audit of their premises, general quality, ethical standards, and check their ownership and financial credentials before we commence any business.

### *4. Supplier Diligence*

McBride has used a supplier due diligence questionnaire to provide us with assurance that our suppliers are operating in a way that meets our high ethical standards. As part of our evolving approach in this area, McBride is, however, in the near future, planning to move to a multi-layered approach around supplier diligence. This will result in the implementation across the Group of: (i) an internally driven questionnaire focusing on specific quality related aspects; and (ii) the Sedex supplier assessment tool. We believe that this will better serve the Group's due diligence requirements going forward.

## **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 and ethical standards. Any such communication will be handled confidentially and may be registered anonymously if the employee so desires.

McBride expects all employees to read, understand and comply with all Group policies that are relevant to their role.

McBride rolled out ethics compliance training to all office-based employees in the financial year 2023/2024. This training covered anti-bribery and corruption, conflicts of interest, data privacy and whistleblowing and sought to ensure that those employees fully understand their obligations under our Group policies in those areas. We intend to carry out further ethics compliance training in the financial year 2024/2025.

### **Next steps**

Geopolitical events, including the war in Ukraine, have resulted in displacement and migration of workers. We are aware of the consequential risk of exploitation within Europe as a result of the continuing conflicts and will continue to monitor this potential labour risk within our supply chain.

We have started our journey toward compliance with the forthcoming EU Corporate Sustainable Due Diligence Directive (CS3D). We are building internal cross-functional alignment and understanding of CS3D requirements and what this means for McBride and its supply chains. We aim to achieve clarity on the high-level ESG risks and impacts that are the most significant in our supply chain and to carry out targeted supplier risk assessment and engagement. In relation to potential social and environmental issues known to affect specific raw material supply chains, we will conduct a deeper-divide risk assessment and due diligence. The results of our risk assessments and supplier screening will be integrated into our existing supplier management systems and processes.

As stated above, in the course of the financial year 2024/2025, a Code of Ethics and Business Conduct will replace our Business Ethics Policy. As part of the roll-out of the Code, we will ask our employees to confirm that they have read, understood and will comply with the Code. We will also continue with our ethics compliance training programme.

This statement is made pursuant to section 54(1) of the Act and constitutes the Group's Anti-Slavery and Human Trafficking Statement for the financial year ending 30 June 2024. This statement was approved by the Board of McBride plc on 17 December 2024.

Signed



Chris Smith, Chief Executive Officer

McBride plc

Date: 27 December 2024